

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

EASTERN DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: _____ SECTION 114(d)(1)-CLEAN AIR ACT, AS AMENDED

✓ CWA, _____ TSCA, _____ RCRA, _____ SWDA

Source Name WCI Steel

Address 1040 Pine Ave. SE

City Warren

State OH

Person Notified Erm Gomes

Title env. engr.

Organization OEPA-NEDO

Date of Notification 11-9-94

Planned Date of Inspection 11/29-30/94

Purpose of Inspection (compliance monitoring, Enforcement Division request etc.)

Water Div. request

Scope CSI

Person Giving Notice Mark E. Conti

Title Environmental Engineer

Organization ESD/EDO

Mark E Conti
(signature)

(A copy of this notification must accompany each Air inspection report).
For all other types of inspections include with file copy of report.

EPA REGION 5 OFFICE ROUTING & TRANSMITTAL SLIP

Mail Code	ACTIVITY	Mail Code	ACTIVITY
R-19J	REGIONAL ADMINISTRATOR	MI-13J	Information Management
A-18J	AIR AND RADIATION DIRECTOR	MISR-12J	Records Management
AE-17J	Air Enforcement	MB-19J	Planning and Budget
AT-16J	Air Toxics and Radiation	P-19J	PUBLIC AFFAIRS
AR-16J	Regulation Development	PG-12J	Graphic Arts
N-4D	CRIMINAL INVESTIGATIONS	PL-12J	Library
C-3T	REGIONAL COUNSEL	H-7J	WASTE MANAGEMENT DIRECTOR
CA-3T	Air/Water/Toxics and General Law	HR-8J	RCRA Director
CS-3T	Solid Waste and Emergency Response	HRE-8J	Enforcement
S-14J	ENVIRONMENTAL SCIENCES DIRECTOR	HAP-8J	Permitting
SL-10C	Central Regional Laboratory	HRM-7J	Program Management
SC-9C	Central District Office	HRIU-8J	Underground Storage Tanks
SE-W	Eastern District Office	HS-6J	Superfund Director
SG-14J	Geographic Information Systems	HSC-8J	Chemical & Emergency Preparedness
SO-14J	Monitoring and Quality Assurance	HSE-5J	Emergency Response
SP-14J	Pesticides and Toxic Substances	HSE1-G	Response Section 1 (Gross Ills)
G-8J	GREAT LAKES PROGRAM	HSM-5J	Program Management
IA-13J	INSPECTOR GENERAL - Audit	HSRL-6J	IL/IN Remedial Response
II-13J	INSPECTOR GENERAL - Investigations	HSRLT-5J	Technical Support
M-19J	PLANNING AND MANAGEMENT DIRECTOR	HSRM-6J	MIN/OH Remedial Response
MC-10J	Contracts and Grants	HSRW-6J	WV/Mt Remedial Response
ME-19J	Environmental Review	W-15J	WATER DIRECTOR
MF-10J	Financial Management	WC-15J	Compliance
MS-13J	Facilities Management & Services	WG-16J	Ground Water Protection
MSS-16J	Supply Room	WD-17J	Safe Drinking Water
MP-4J	Human Resources	WQ-16J	Water Quality
MPT-12J	Training		
MPS-12J	Safety		

ATTENTION:

REMARKS (Use reverse if more space is needed)

~~X 3-17-85~~ ~~Miki Miskulka~~
~~WC-15J~~

Thad Slaughter HRE-8J

FROM Murray Lantier DATE 5/1/98

PA-RS1750-4 (3/92)

Printed on Request

cc: Nicole
Thad
Paul Ruess
Leslie Lantier

Trawl



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EASTERN DISTRICT OFFICE
25089 CENTER RIDGE ROAD
WESTLAKE, OH 44145

RECEIVED
MAR 15 1995
COMPLIANCE SECTION

March 10, 1995

MEMORANDUM

SUBJECT: Compliance Sampling Inspection - WCI Steel, Inc.,
Warren, Ohio (OH0101709, AFE107:GG)

FROM: Mark E. Conti, ^{WEC}environmental engineer

THRU: A. R. Winklhofer, chief
Eastern District Office (SE-W) ^{AW}

TO: Water Compliance Section (WC-15J)

ATTN: Michael Mikulka, chief

On November 29-30, 1994, Michael Patton, Larry Lins, and I conducted a compliance sampling inspection at WCI Steel. The inspection was requested by the Water Division. My findings are summarized in the attached report. If you have any questions regarding the report, please contact me at 216/522-7260.

Attachments



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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
ENVIRONMENTAL SCIENCES DIVISION
EASTERN DISTRICT OFFICE

Compliance Sampling Inspection Report

I. PERMITTEE IDENTIFICATION

A. Facility Name and Address

WCI Steel, Inc.
1040 Pine Avenue SE
Warren, Ohio 44483-6528

B. Responsible Official

Thomas O. Shepker, manager-environmental control
telephone number: 216/841-8200

C. NPDES Permit

NPDES permit number: OH0101079
effective date: April 30, 1990
modification date: January 19, 1993
expiration date: April 17, 1995

D. Receiving Water

Mahoning river

II. DATES OF INSPECTION

November 29-30, 1994

III. PARTICIPANTS

A. Facility

Keith A. McLaughlin, environmental engineer
telephone number: 216/841-8201 or 8162

B. U.S. Environmental Protection Agency - EDO

Mark E. Conti, environmental engineer
Michael Patton, engineering technician
Larry Lins, engineering technician

C. Ohio EPA - Northeast District Office

Ermelindo Gomes - environmental engineer
Karl Hoerig

IV. OBJECTIVES

The objectives of the inspection were to determine: (1) compliance with pH limits; (2) whether the facility's discharges contribute to elevated zinc levels at Intake Station 804; (3) whether a cross connection exists between the blast furnace recycle system and blast furnace non-contact cooling water; and (4) compliance status at Internal Station 602 and Outfall 013.

V. SUMMARY OF FINDINGS

A. Visual Observations of Outfalls

On November 29 and 30, 1994, I made visual observations of the facility's outfalls. My observations are summarized in Tables 1 and 2. There was an oily sheen on the discharge of Outfall 010 on both dates. Part III.2. of the facility's NPDES permit prohibits oily sheens. Sample results for Outfall 010 are discussed in Paragraph F.

B. Temperature and pH Measurements

On November 29 and 30, 1994, we measured the temperature and pH at outfalls, internal stations, and in the Mahoning river. The results are summarized in Tables 3 and 4.

1. On November 29, we measured the pH at Outfall 017 twice during the day. The values were 1.92 s.u. at a measured flow rate of 7.5 gpm and 2.28 s.u. at a measured flow rate of 7.0 gpm. Mr. McLaughlin checked the pH at the outfall later that night and found it to be about 2.1 s.u. This outfall is supposed to be limited to groundwater and stormwater runoff from the No.6 Pickle Line and acid regeneration plant areas. Mr. McLaughlin told us that there have been instances of low pH at the outfall in the past. Consequently, the facility had plugged the outfall with an inflatable stopper. Backed up water was then pumped from Lift Station No.9 to Pond No.5. The plug may have been forced out of the pipe by hydraulic pressure. Mr. McLaughlin had the plug reinserted the night of November 29. The pipe and reinserted plug are shown in Photograph No.1.
2. On November 29, we measured a pH of 9.10 s.u. at Outfall 010. The facility's permit limit is 9.0 s.u.

3. On November 30, we measured a pH of 10.30 s.u. at Internal Station 602. The facility continuously monitors the pH of the discharge. The permit limit is 7-10 s.u. The pH may not be outside this range for more than 7 hours and 26 minutes in any calendar month, nor may any individual excursion exceed 60 minutes.
4. The pH at Outfall 002 was within the permitted range, but it varied more than I would expect for a groundwater/stormwater outfall. On November 29, the pH was 7.23 s.u. On November 30, the pH was 8.12 s.u. There was not any precipitation either day.

C. Zinc Levels in Mahoning River

The zinc concentration was measured in the Mahoning river upstream of WCI Steel's outfalls and at Intake Station 804. The results did not show an increased concentration at Intake Station 804 versus upstream. The results are summarized in Table 5.

D. Sampling for Blast Furnace Non-Contact Cooling Water Contamination

Ammonia, cyanide, and zinc concentrations were measured at Intake Station 804 and Internal Station 608, which is once-through non-contact cooling water for the blast furnace. There was not a significant increase of the pollutants in the cooling water. The results are summarized in Table 6.

E. Compliance Sampling at Internal Station 602

The lead and zinc loadings were below the facility's discharge limitations. The results are summarized in Table 7.

F. Compliance Sampling at Outfall 010

Oil and grease was sampled on November 29 and 30 in conjunction with visual observations. The oil and grease concentrations were below the facility's discharge limitation. The results are summarized in Table 8.

G. Compliance Sampling at Outfall 013

The ammonia, cyanide, lead, and zinc concentrations were below the facility's discharge limitations. The results are summarized in Table 9.

H. Metals Sampling at Outfall 017

A grab sample for metals analysis was collected at Outfall 017 on November 29. The concentration of zinc, iron, copper, and lead were particularly high. The low pH and high metals concentrations suggest that pickle line rinse water was being directly discharged. The metals results are summarized in Table 10.

I. Other

1. The facility is pretreating acidic wastewaters at Lift Station No.9 with a lime slurry. This is done to neutralize the wastewaters before they enter the equalization/skimming ponds. On November 29, we measured a pH of 6.88 s.u. at the central treatment plant influent. The central treatment plant receives wastewater from Pond No.6.
2. Pond No.6 continues to leak. Leaking water is collected in Ponds No.6A and 6AA. Water is pumped back to Pond No.6 from Pond No.6A. Pumps are activated by a float system. At the time of the inspection, the oily sludge from Pond No.6A was being dredged. There was no signs of leakage from Ponds No.6A or 6AA into the Mahoning river.

LIST OF ATTACHMENTS

<u>ATTACHMENT NUMBER</u>	<u>DESCRIPTION</u>
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1	Tables
2	Photographs
3	EPA Form 3560-3

ATTACHMENT 1

LIST OF TABLES

<u>TABLE NUMBER</u>	<u>TITLE</u>
1	Visual Observations of Outfalls on 11-29-94
2	Visual Observations of Outfalls on 11-30-94
3	Field Measurements for pH and Temperature on 11-29-94
4	Field Measurements for pH and Temperature on 11-30-94
5	Comparison of Zinc Concentrations in Upstream Mahoning River Sample with Intake Station 804
6	Comparison of Ammonia, Cyanide, and Zinc Concentrations at Intake 804 with Blast Furnace Non-Contact Cooling Water
7	Comparison of Lead and Zinc Concentrations at Internal Station 602 with NPDES Permit Limitations
8	Comparison of Oil and Grease Concentrations at Outfall 010 with NPDES Permit Limitations
9	Comparison of Lead and Zinc Concentrations at Outfall 013 with NPDES Permit Limitations
10	Results for Sample Collected at Outfall 017

TABLE 1

Visual Observations of Outfalls on 11-29-94

Outfall	Time	Observation
002	1258 EST	Effluent was clear and colorless.
003	1304 EST	Effluent had very light solids and was colorless.
004	1315 EST	No flow. Outfall was welded shut.
006	1350 EST	Effluent had a moderate amount of solids and was medium brown in color.
007	1400 EST	Effluent had very light solids and was pale yellow-brown in color.
008	1403 EST	Effluent had very light solids and was pale brown in color.
009	1410 EST	No flow. Outfall was cemented shut.
010	1441 EST	Effluent was clear and pale brown in color. Effluent had an oily sheen. Oil was not visible in channel between outfall and river.
011	1422 EST	Effluent was clear and colorless.
012	1428 EST	Effluent was clear and colorless.
013	--	Not observed.
017	1320 EST	Effluent was clear and pale yellow-brown in color.

TABLE 2

Visual Observations of Outfalls on 11-30-94

Outfall	Time	Observation
002	0815 EST	Effluent was clear and colorless.
003	0824 EST	Effluent had very light solids and was colorless.
004	0829 EST	No flow. Outfall was welded shut.
006	0832 EST	Effluent had a light to moderate amount of solids and was medium rust-brown in color.
007	0848 EST	Effluent was clear and colorless.
008	0900 EST	Effluent was clear and pale yellow in color.
009	0906 EST	No flow. Outfall was cemented shut.
010	0915 EST	Effluent was clear and was pale brown in color. Effluent had an oily sheen. Oil was not visible in channel between outfall and river.
011	0928 EST	Effluent was clear and colorless.
012	0934 EST	Effluent was clear and colorless.
013	1103 EST	Effluent was clear and pale yellow-brown in color.
017	0832 EST	No flow. Outfall was plugged with an inflatable stopper.

TABLE 3

Field Measurements for pH and Temperature on 11-29-94

Sample Location	Time	pH ¹ (s.u.)	Temperature (°C)
upstream	--	--	--
outfall 002	1258 EST	7.23	11.5
outfall 003	1304 EST	8.04	11.3
outfall 017	1320 EST	1.92	14.3
	1520 EST	2.28	16.9
outfall 006	1350 EST	7.42	17.0
outfall 007	1400 EST	8.07	9.7
outfall 008	1403 EST	8.16	11.5
outfall 010	1441 EST	9.10	7.5
outfall 011	1422 EST	8.39	9.0
outfall 012	1428 EST	8.34	9.0
outfall 013	1124 EST	8.53	14.3
intake 804	1135 EST	7.88	5.9
CTP influent ²	1022 EST	6.88	22.6
internal 602	1006 EST	9.54	23.1
internal 608	1107 EST	7.82	15.6

¹The pH at these outfalls shall not be less than 6.5 s.u. nor greater than 9.0 s.u. The pH at internal station 602 shall not be less than 7.0 s.u. nor greater than 10.0 s.u. The total time during which pH values are outside this range shall not exceed 7 hours and 26 minutes in any calendar month, and no individual excursion shall exceed 60 minutes.

²CTP influent is wastewater pumped from No.6 pond to the central treatment plant.

TABLE 4

Field Measurements for pH and Temperature on 11-30-94

Sample Location	Time	pH ¹ (s.u.)	Temperature (°C)
upstream ²	0805 EST	7.82	3.9
outfall 002	0815 EST	8.12	10.5
outfall 003	0824 EST	8.08	11.4
outfall 017	--	--	--
outfall 006	0832 EST	7.40	22.3
outfall 007	0848 EST	8.11	7.4
outfall 008	0900 EST	8.01	9.6
outfall 010	0915 EST	8.40	9.6
outfall 011	0928 EST	8.39	7.5
outfall 012	0934 EST	7.98	8.0
outfall 013	1103 EST	8.25	11.4
intake 804	1055 EST	8.38	5.0
CTP influent	--	--	--
internal 602	1013 EST	10.30	22.6
internal 608	1038 EST	7.94	15.6

¹The pH at these outfalls shall not be less than 6.5 s.u. nor greater than 9.0 s.u. The pH at internal station 602 shall not be less than 7.0 s.u. nor greater than 10.0 s.u. The total time during which pH values are outside this range shall not exceed 7 hours and 26 minutes in any calendar month, and no individual excursion shall exceed 60 minutes.

²The upstream sample was collected from the Mahoning river upstream of all NPDES permitted outfalls and stormwater outfalls. The sample was collected immediately upstream of the furthest upstream stormwater outfall.

TABLE 5

Comparison of Zinc Concentration in Upstream Mahoning River
Sample with Intake Station 804

Pollutant	Sample Location	
	Upstream ¹	Intake 804 ²
Zinc, total	26 µg/L	<20 µg/L

¹Sample was collected upstream of all NPDES outfalls and stormwater outfalls. Sample was a 24-hour composite sample collected from 0945-0845 EST 11/29-30/94. Equal volume aliquots were collected hourly.

²Sample was a 24-hour composite sample collected from 1145-1045 EST 11/29-30/94. Equal volume aliquots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

TABLE 6

Comparison of Ammonia, Cyanide, and Zinc Concentrations at Intake 804 with Blast Furnace Non-Contact Cooling Water

Pollutant	Sample Location	
	Intake 804 ¹	Internal 608 ²
Ammonia	<0.05 mg/L	<0.05 mg/L
Cyanide, total	<8 µg/L	<8 µg/L
Zinc, total	<20 µg/L	24 µg/L

¹Sample was a 24-hour composite sample collected from 1145-1045 EST 11/29-30/94. Equal volume aliquots were collected hourly.

²Sample was a 24-hour composite sample collected from 1115-1015 EST 11/29-30/94. Equal volume aliquots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

TABLE 7

Comparison of Lead and Zinc Concentrations at Internal Station
602 with NPDES Permit Limitations

Pollutant	Discharge Limitation		U.S. EPA Sample Results ¹	
	30 Day	Daily	Conc.	Loading ²
Lead, total	1.61 kg/d	4.61 kg/d	<80 µg/L	<0.39 kg/d
Zinc, total	2.16 kg/d	6.32 kg/d	<40 µg/L	<0.20 kg/d

¹Sample was a 24-hour composite sample collected from 1115-1015 EST 11/29-30/94. Equal volume aliquots were collected hourly.

²Loadings are based on a 24-hour flow of 1.29 million gallons. WCI Steel recorded a total flow of 1.29 million gallons at the discharge of the central treatment plant's final clarifier from 8:00 a.m. to 8:00 a.m. 11/29-30/94.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level. Where concentrations were below detection, the loading was calculated using the detection level.

TABLE 8

Comparison of Oil and Grease Concentrations at Outfall 010 with
NPDES Permit Limitations

Date/Time	Discharge Limitation		Oil & Grease Results
	30 Day	Daily	
11-29-94/1441 EST	15 mg/L	20 mg/L	3.3 mg/L
11-30-94/0915 EST	15 mg/L	20 mg/L	1.3 mg/L

TABLE 9

Comparison of Lead and Zinc Concentrations at Outfall 013 with
NPDES Permit Limitations

Pollutant	Discharge Limitation		Results ¹
	30 Day	Daily	
Ammonia	0.92 mg/L	1.09 mg/L	<0.05 mg/L
Cyanide, total	0.017 mg/L	0.020 mg/L	<0.008 mg/L
Lead, total	17 µg/L	63 µg/L	2 µg/L
Zinc, total	31 µg/L	53 µg/L	28 µg/L

¹Sample was a 24-hour composite sample collected from 1130-1030 EST 11/29-30/94. Equal volume aliquots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

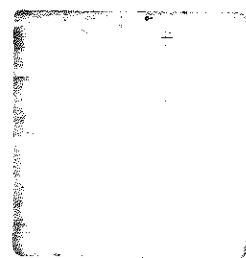
TABLE 10

Results for Sample Collected at Outfall 017

Parameter	Concentration, $\mu\text{g/L}$
aluminum	36000
barium	161
beryllium	4
boron	28
cadmium	<10
calcium	284000
chromium	253
cobalt	13
copper	5360
iron	167000
lead	2730
lithium	64
magnesium	29000
manganese	4970
molybdenum	22
nickel	220
potassium	8000
silver	<6
sodium	46000
strontium	670
tin	<40
titanium	373
vanadium	62
yttrium	22
zinc	37000

Notes: 1. The sample was a grab collected at 1320 EST, 11-29-94. The measured flow rate at 1335 EST was 7.5 gpm. 2. "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

ATTACHMENT 2



No. 2 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0906 EST
DESCRIPTION: Pond No.6A.
Mahoning river is in background.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

No. 1 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0832 EST
DESCRIPTION: Inflatable plug in
discharge pipe at Outfall 017.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

No. 3 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0906 EST
DESCRIPTION: Pond No.6AA
Mahoning river is in background.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

ATTACHMENT 3



United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code **1N 25** NPDES **30H0101079** 11 12941129 17 Inspection Type **18S** Inspector **19J** Fac Type **202**

Remarks

Reserved **67** Facility Evaluation Rating **703** BI **71N** QA **72N** Reserved **73** **74** **75** **80**

Section B: Facility Data

Name and Location of Facility Inspected

WCI Steel, Inc.
1040 Pine Ave.
Warren, OH 44483-6528

Entry Time ☒ AM ☐ PM
8:15

Permit Effective Date
4-30-90

Exit Time/Date
11:30 AM/11-30-94

Permit Expiration Date
4-17-95

Name(s) of On-Site Representative(s)

Keith A. McLaughlin

Title(s)

environmental engineer

Phone No(s)

(216) 841-8201
or 8162

Name, Address of Responsible Official

Thomas O. Shepker
1040 Pine Avenue SE
Warren, OH 44483-6528

Title

mgt. - environmental control

Phone No.

(216) 841-8200

Contacted

☐ Yes ☒ No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Pretreatment	N	Operations & Maintenance
N	Records/Reports	N	Laboratory	N	Compliance Schedules	N	Sludge Disposal
S	Facility Site Review	*	Effluent/Receiving Waters	N	Self-Monitoring Program	-	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

* see narrative report

Name(s) and Signature(s) of Inspector(s)

Mark E. Conti
Mark E. Conti

Agency/Office/Telephone

USEPA/EDO/216-835-5200

Date

3-10-95

Signature of Reviewer

Philip E. Behrman

Agency/Office

USEPA Reg 5 EDO

Date

3/10/95

Regulatory Office Use Only

Action Taken

Date

Compliance Status

☐ Noncompliance
☐ Compliance

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: WCI STEEL INC.
USEPA I.D.: OH 060 409 521
Street: 1040 PINE AVE S.E.
City: WARREN State: OH Zip: 44483-6528
County: TRUMBELL Telephone: (216) 841-8200
Owner/Operator: WCI STEEL INC
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: (216) 841-8392
Inspection Date: 5/26/93 Time: _____
Advance notice of inspection given? (yes) X (no) _____
If so, how far in advance? ~ 2 weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>DAVID R. BARNA</u>	<u>USEPA ENV ENGR</u>	<u>(216) 835-5200</u>
Facility Representative:	<u>THOMAS B. SHEPHERD, WCI, MANAGER</u>	<u>(216) 841-8200</u>	
	<u>KEITH A. McLAUGHLIN, WCI, ENV. ENGR</u>	<u>(216) 841-8162</u>	
	<u>RICHARD J. GRADISHAR, WCI, ENV. ENGR</u>	<u>(216) 841-8201</u>	

Cond. Exempt SQG _____ SQG _____ Large Quantity Generator X
LDR Checklist Attached: (yes) X (no) _____

NOTE: LDR requirements are not applicable to CESQGs.

ACTIVITIES

Containers _____	Used oil burner _____
Tanks <u>X</u>	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

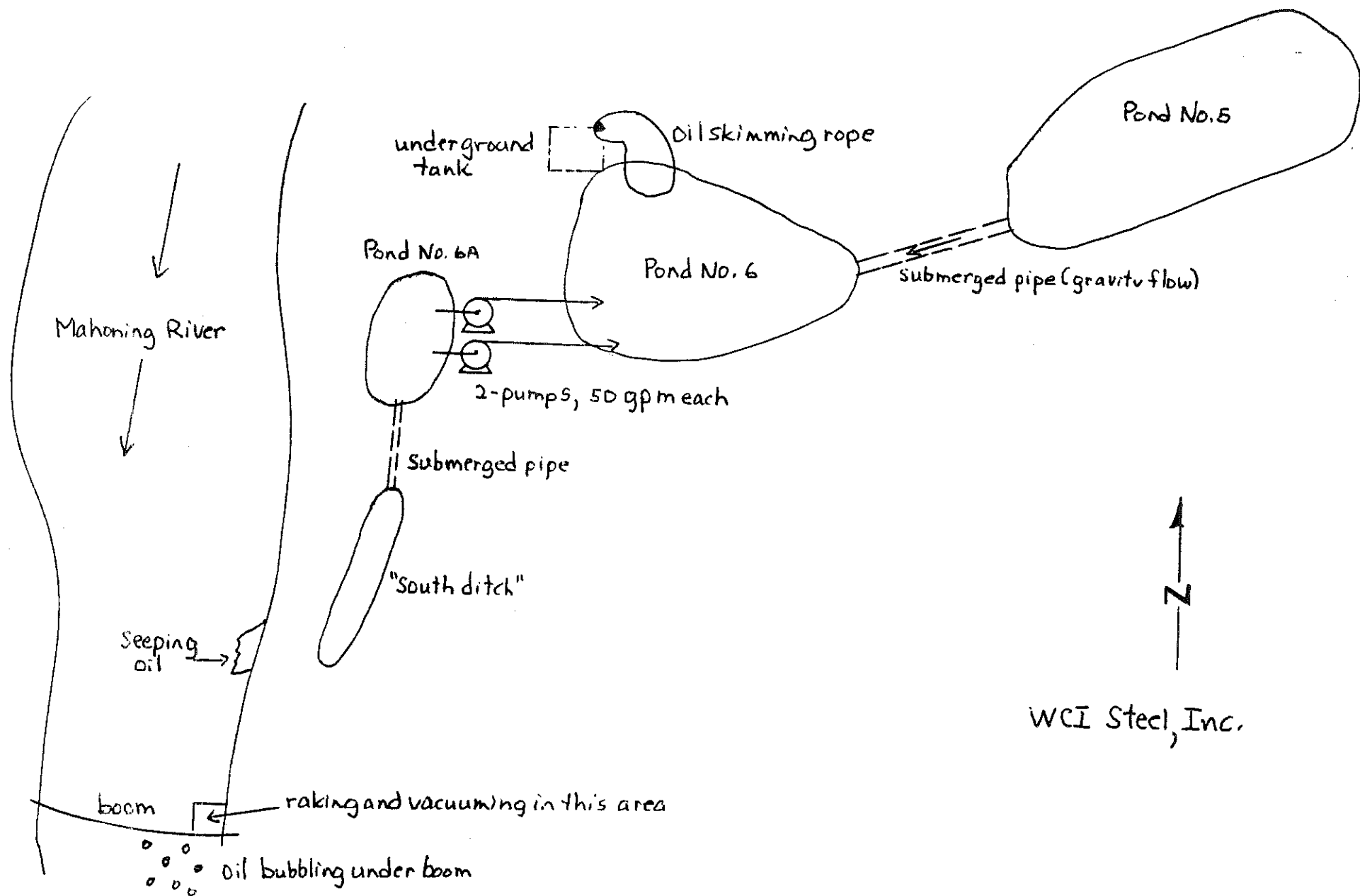


FIGURE 2.- Sketch of Ponds on May 12, 1993.

- Not to scale -
M. Conti 9-30-93

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

Refer to Narrative Report.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) X

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) _____ (no) X

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes) X (no) _____

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) _____ (no) X

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

(1)

- (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

(1)

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

(1) Routinely generated wastes, sludges, dusts, are characterized 2/yr, including TCLP.
It appears that the unlined surface impoundment system (NPDES treatment ponds Nos. 5, 6, 6A may have been receiving wastewaters with pH less than 2 s.u.
(Refer to narrative report)

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

Y

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

mining exclusion (Bevill) wastes :

- BOF slag
- BOF ESP dust
- Blast furnace slag
- Blast furnace sludge (wmp)
- Blast furnace casthouse baghouse dust

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06(A)?

Y

If so, please identify these waste streams below:

ROGZ

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:
- a. Using or reusing the material as an ingredient in an industrial process to make a product? Y
 - i. If so, is the material being reclaimed before it is used or reused? Y
 - b. Using the material as a substitute for commercial products? N
 - c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock? Y
 - i. If so, is the material reclaimed before returning to the original process? Y

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01? N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12? Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41? Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57
AND OAC 3745-52-60)

Y/N/NA RMK #

8. Does the generator import or export hazardous waste?

N

If so, are the wastes handled in accordance with the
requirements of 3745-52-50 through 3745-52-57 and
3745-52-60?

N/A

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport
requirements prior to offering hazardous wastes for
transport off-site:

a. The waste material is packaged, labeled, and marked
in accordance with the applicable DOT regulations
[3745-52-30, 3745-52-31, and 3745-52-32(A)]?

Y

b. Each container with a capacity of 110 gallons or less
is affixed with a completed hazardous waste label as
required by 3745-52-32(B)?

Y

c. Before transporting hazardous wastes off-site or
offering hazardous wastes for transportation off-
site, does the generator placard or offer the
appropriate DOT placards to the initial transporter
in compliance with 3745-52-33?

Y

REMARKS - PRETRANSPORT REQUIREMENTS

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34 (A) (3)]

Y _____

b. The date that accumulation began is clearly marked on each container? [3745-52-34 (A) (2)]

_____ (2)

In addition, OAC 3745-52-34 (A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

Y _____

If so, OAC 3745-52-34 (A) (1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

N _____

a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

N/A _____

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

(2) all less than 90 day accumulation tanks (galvanizing line^{SPL} sump; terne line^{SPL} sump; No 5 SPL tanks, silicon settling tanks) are cleaned out, inspected every 90 days.

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA DMK

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)? Y
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)? Y
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)? Y
 2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y
 - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42? N/A
- NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.
3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)] N/A
 - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)] N/A
 4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N _____

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

N/A _____

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97(A) and (B)? [3745-52-34 (A) (1)]

N/A _____

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)] Y _____
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)] Y _____
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)] Y _____

REMARKS - PERSONNEL TRAINING REQUIREMENTS

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: _____
USEPA I.D.: _____ HWFB No.: _____
Street: _____
City: _____ State: _____ Zip: _____
County: _____ Telephone: _____
Fax No: _____ PUCO No.: _____
Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____
Inspection Date: ____/____/____ Time: ____-____
Advance notice of inspection given? (yes) ____ (no) ____
If so, how far in advance? _____

<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors: _____		

Facility Representative: _____		

STATUS

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator ☒
Treatment _____ Storage ☒ Disposal _____ Transporter _____
Part A Permit: (yes) ☒ (no) _____ Part B Permit: (yes) _____ (no) ☒
LDR Checklist Attached: (yes) _____ (no) _____

ACTIVITIES

Containers _____	Used oil burner _____
Tanks <input checked="" type="checkbox"/>	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK

1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y

When was the owner/operator's Part A submitted:

2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

Y

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

N/A

If yes, what date was the PCR submitted?

3. Has the owner/operator submitted a Part B?

Y

PERMIT BY RULE REQUIREMENTS

4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

N

a. If so, please describe the rule change below:

b. What was the effective date of the rule or statute change in Ohio?

- c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40(C) (D)?

N/A

NOTE: In accordance with 3745-50-40(D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part B by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

- d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40(C) (1) (a)]

N/A

i. What was the date of notification?

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or U.S. EPA) as required by OAC 3745-65-11?

Y _____

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y _____

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13 (A) (1)?
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13 (A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13 (A) (3) (b)]
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13 (B) (1) through (6)]:
- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13 (B) (1)]
- b. The test methods to be used? [3745-65-13 (B) (2)]
- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13 (B) (3) (a) (b)]
- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13 (B) (4)]
- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13 (B) (5)]

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

- f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

Y

- g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):**

N/A

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B)(7)]
- ii. The analysis of test data? [3745-65-13(B)(7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)]

- h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 applies to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

Y

Y

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73 (B) (1)]
 - b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:
 - i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?
 - ii. The estimated (or actual) weight, volume or density of the waste?
 - iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?
 - c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
 - d. Records of incidents which required implementation of the contingency plan?
 - e. Records of any waste analyses and trial tests required to be performed?
 - f. Records of the inspections required by the general inspection requirements under 3745-65-15?
 - g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)?
 - h. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73 (B) (2)]
 - i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

★

Y

N/A

N/A

★ INFORMATION MAINTAINED IN FILE
VARIOUS LOCATIONS

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?
- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,

	Y	
	_____	_____

 - a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]

	Y	
	_____	_____
 - b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]

	Y	
	_____	_____
 - c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

	Y	
	_____	_____
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

	Y	
	_____	_____

 - a. Is the schedule kept at the facility? [3745-65-15(B) (2)]

	Y	
	_____	_____
 - b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]

	Y	
	_____	_____
 - c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

	Y	
	_____	_____

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or;
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

REMARKS - SECURITY REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the facility provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?

2. Does the facility provide personnel training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?

3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?

4. Does the facility keep all of the records required by 3745-65-16(D) (E) including written job titles, job descriptions and documented employee training records?

REMARKS - PERSONNEL TRAINING

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?

 - a. If yes, was the contingency plan implemented? [3745-65-51(B)]

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]

 - a. Internal alarm system?

 - b. Access to telephone, radio or other device for summoning emergency assistance?

 - c. Portable fire control equipment, spill control and decontamination equipment?

 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33(A)]

 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34]

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]
-

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52 (A) (B) (C) (D) (E)]
 - a. Actions to be taken by personnel in the event of an emergency? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]? Y _____
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)] Y _____
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)] Y _____
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y _____
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55] Y _____
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)? Y _____

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? N
 - a. If yes, was the contingency plan implemented? N/A
[3745-65-51(B)]

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
 - a. Internal alarm system? Y
 - b. Access to telephone, radio or other device for summoning emergency assistance? Y
 - c. Portable fire control equipment, spill control and decontamination equipment? Y
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] (3)
 - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs? Y
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] Y
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y

(3) inspected monthly, not tested according to UST Steel

7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] Y
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)] N/A

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)]
 - b. In good condition? [3745-66-71]
 - c. Compatible with wastes stored in them? [3745-66-72]
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections?
 - b. Name of inspector?
 - c. Notation of observations made during the inspection?
 - d. The date and nature of any repairs or other remedial action?
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D)(2) and (C)(1)(a)]

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34 (C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

N

If so, are the following requirements of OAC 3745-52-34 (C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

N/A

↓

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34 (C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73 (A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N/A

- a. If so, did the generator comply with 3745-52-34 (A) within three (3) days? and;
- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

↓

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS**WASTE EVALUATION (OAC 3745-52-11)**Y/N/NA **RMK** #

1. Have the wastes generated at the facility been evaluated as required under 3745-52-11? _____
- (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)] _____

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)] _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

3. Has the generator obtained an identification number from either U.S. EPA or Ohio EPA as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport? _____

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being reclaimed under a contractual agreement as defined in OAC 3745-52-20(F)? _____

If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the Manifest Requirements checklist to document compliance with these requirements.

SQG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION
(OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

5. Is an emergency coordinator available at all times?
 [3745-52-34 (D) (5) (a)] _____
6. Has the following information been posted by the
 telephone? [3745-52-34 (D) (5) (b)]:
 - a. Name and telephone number of emergency coordinator? _____
 - b. Location of fire and spill control equipment? _____
 - c. Telephone number of local fire department? _____
7. Have emergencies been reported to the National Response
 Center? [3745-52-34 (D) (5) (d)] _____
8. Are all employees thoroughly familiar with proper
 handling and emergency procedures? [3745-52-34 (D) (5) (c)] _____

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)

9. Is the generator accumulating hazardous wastes in
 containers? If so,
 - a. Is the date accumulation began clearly marked on
 each container [3745-52-34 (A) (2)]? _____
 - b. Is each container clearly marked with the words
 "Hazardous Waste" [3745-52-34 (A) (3)]? _____

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist. If the Small Quantity Generator is operating a satellite accumulation area, the Satellite Accumulation Area Requirements portion of the checklist must also be completed.

10. Is the generator accumulating hazardous wastes in tanks? _____
 - a. If so, is each tank clearly marked with the words
 "Hazardous Waste" [3745-52-34 (A) (3)]? _____

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SQG's checklist.

Y/E/EA DMK #

11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]

a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 (or 270) days?

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

2/A

ACCUMULATION IN TANKS FOR SMALL QUANTITY GENERATORS
(BETWEEN 100 AND 1000 KG/MO)

Applicability: All of the items on this checklist apply to small quantity generators who accumulate hazardous waste in tanks for less than 180 days (or 270 days if hazardous waste must be shipped greater than 200 miles) and do not accumulate over six thousand kg on-site at any time.

TANK SYSTEM OPERATING REQUIREMENTS (OAC 3745-66-992(B))

Y/N/NA **RMK** #

1. Does the small quantity generator comply with the following operating requirements of OAC 3745-66-992(B):
 - a. Does the treatment or storage of hazardous waste in the tank comply with 3745-65-17(B)? _____
 - b. Does the generator ensure that wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail before its intended life? _____
 - c. Are uncovered tanks operated with 2 feet of freeboard? _____
 - i. If not, is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank? _____
 - d. If waste is continuously added, is the tank equipped with a waste feed cut-off or bypass system? _____

TANK SYSTEM INSPECTIONS (OAC 3745-66-992(C))

2. Is the generator inspecting the following components of the tank system: [3745-66-992(C)]
 - a. Discharge control equipment (daily)? _____
 - b. The data from monitoring equipment (daily)? _____
 - c. The level of the waste in the tank (daily)? _____
 - d. The construction material (weekly)? _____
 - e. The area surrounding the tank (weekly)? _____

SQG - TANK SYSTEM CLOSURE REQUIREMENTS
(OAC 3745-66-992(D))

Y/N/NA Rmk #

3. Has the small quantity generator, upon closure of the tank, removed all hazardous waste from the tank system in compliance with OAC 3745-66-992(D)?
- _____

SPECIAL REQUIREMENTS - IGNITABLE AND INCOMPATIBLE WASTES (OAC 3745-66-992(E))

4. Has the SQG complied with either of the two following requirements of OAC 3745-66-992(E):

a. Are ignitable or reactive wastes treated before or immediately after placement in the tank to render either non-reactive or not ignitable?

i. Has this treatment activity been conducted in compliance with 3745-65-17(B)?

OR;

b. Are ignitable and/or reactive wastes stored or treated in a manner which protects the waste from conditions that may cause ignition or reaction?

NOTE: In accordance with Ohio's hazardous waste rules, generators (including small quantity generators) cannot treat hazardous wastes in containers or tanks without obtaining a permit.

5. Is the generator complying with the N.F.P.A.C.L. CODE (1977 or 1981) buffer zone requirements?
- _____

6. Are incompatible wastes placed in the same tank?
- _____

a. If so, has the SQG complied with OAC 3745-65-17(B)? [3745-66-992(F)]

7. Are incompatible wastes placed in an unwashed tank?
- _____

a. If so, has the SQG complied with OAC 3745-65-17(B)? [3745-66-992(F)]

REMARKS - SQG TANK SYSTEM ACCUMULATION REQUIREMENTS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMKs

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)]

N/A

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)]

N/A

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA RMKs

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

N/A

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

N/A

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

N

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]	Y	
(b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?	Y	
(b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]	Y	D002 D007 CGZ ?

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA REMARKS

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? ✓
- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?
- i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:
- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]
- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

✓ CWT - neutralization
check with 5 & 6 ponds

NOTIFICATION/CERTIFICATION

Y/N/NA RMKs

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y

- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

Y

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

N/A

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

Y

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

N/A

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

N/A

If so, does the notice contain the following information:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]
- (b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]
- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.6(a) (3) (iv)]
- (e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A) (6); 40 CFR 268.7(a) (7)]

Y

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

N/A

(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?

(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]

2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?

If so, does the treatment facility test its waste treatment residues according to the following requirements:

- (a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):

Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]

- (b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):

Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]

3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?

- (a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMX

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

N/A

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

- (d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

N/A

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

- (a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

- (a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

- i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

- a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]
- b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]
- c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]

- ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMKs

1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
- NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.
3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA RMX

N/A

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met: _____
- (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)] _____
- (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)] _____
- (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)] _____
- i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.7(a) (2) (iii)] _____
- (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)] _____
- i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)] _____
- ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)] _____
- (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)] _____
- (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)] _____

Y/N/NA RMK

- (g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]
-

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

Y/N/NA RMK#

1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):

(a) The identification of the contents?	N	
(b) The date which accumulation began?	N/A	
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):

(a) A description of its contents?	Y	
(b) The quantity of each hazardous waste received?	Y	
(c) The date each period of accumulation begins? or;		* operating record kept
(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]	Y	L
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,

(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]	N	
	N/A	

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)?
If so,

N

- (a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N/A

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

**SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE
WASTES (OAC 3745-65-17)**

Y/N/NA RMK #

NOTE: The following requirements are generally applicable to TSD facilities only. See OAC Rule 3745-66-992(F)(2) for applicability of ignitable/reactive/incompatible waste requirements for SQGs accumulating hazardous waste in tanks.

1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements?
[3745-65-17]

a. Wastes are protected from sources of ignition and/or reaction?

Y

b. Physical separation of incompatible waste materials?

Y

c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?

Y

Rejection

d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?

Y

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?
 - a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?
 - b. A description of how final closure will meet the requirements of 3745-66-11?
 - c. An estimate of the maximum amount of hazardous waste ever in inventory?
 - d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?
 - e. The year closure is expected to begin and a schedule for the various phases of closure?
 - f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12 (C)]
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12 (D)]
4. Has the closure plan (and post-closure plan, if applicable) FOR ANY NON LAND DISPOSAL UNIT(S) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12 (D)]
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13 (A)]
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13 (B)]
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]

Y

Y

Y

Y

Y

N/A

N?

N/A

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16? N/A
9. What permitted units at the facility have been closed in accordance with an approved closure plan?
N/A
10. If closure was partial, list the regulated units which remain in use at the facility:
N/A
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] N/A
- If so, does the post-closure plan include:
- a. A description of proposed ground water monitoring? N/A
 - b. A description of planned maintenance activities? N/A
 - c. The name, address and phone number of person/office to contact during the post-closure period? N/A
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] N/A
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:
- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? N/A
 - b. Land use is restricted under closure and post-closure rules? [3745-66-19] N/A

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

NOTE: Tanks used to store or treat wastes containing no free liquids (as determined by the Paint Filter Liquid Test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements of 3745-66-93. Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93.

For generators who accumulate wastes in tanks for less than 90 days, compliance with the closure requirement of 3745-66-97(C) and the waste analysis requirement of 3745-66-991 is not required.

NEW TANK SYSTEM - Installation commencing after July 14, 1986.

EXISTING TANK SYSTEM - Installation or operation commencing on or before July 14, 1986.

Y/N/NA RMK #

1. Is the generator operating any of the following classifications of tank systems for the management of hazardous waste(s):

- a. New tank system(s)? If so, Y _____

Did the o/o install secondary containment meeting the requirements of 3745-66-93 for the unit(s) prior to putting each into service? [3745-66-93(A)(1)] Y _____

- b. Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so, N/A _____

Did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the tank by January 12, 1989? [3745-66-93(A)(2)] N/A _____

- c. Existing tank system(s) of known, documentable age? Y _____

- i. If so, has the tank reached 15 years of age?
(yes) _____ (no) X

If the answer to 1.c.i. above is no, the tank is not required to have secondary containment until the unit reaches 15 years of age.

If the answer to 1.c.i. above is no, when is the unit required to have secondary containment?

If the answer to 1.c.i. above is yes, did the o/o provide secondary containment for the unit when it reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A)(3)] N/A _____

- d. Existing tank system(s) for which the age cannot be documented? If so, N/A

i. Is the facility greater than 7 years of age?
(yes) _____ (no) _____

If the facility is < 7 years of age, secondary containment for the tank is not required until January 12, 1995.

ii. If the facility is > 7 years of age, is the facility also > 15 years of age?

(yes) _____ (no) _____

If the answer to 1.d.ii above is no, the o/o is not required to provide secondary containment for the tank until the facility reaches 15 years of age.

If the answer to 1.d.ii above is no, when is the secondary containment required for the tank(s)?

If the answer to 1.d.ii. above is yes, did the o/o provide secondary containment for the tank when the facility reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A) (4)] N/A

2. Is the o/o operating a tank system which is used to manage a material that became a hazardous waste after January 12, 1987? If so, N

a. Has the o/o provided secondary containment meeting the requirements of 3745-66-93 for the unit as required in questions 1.a. through 1.d.? (NOTE: The date the material became a hazardous waste must be used in place of January 12, 1989) [3745-66-93(A) (5)] N/A

3. IF THE O/O HAS NOT PROVIDED SECONDARY CONTAINMENT FOR THE TANK SYSTEM(S): Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from the Director in accordance with 3745-66-93(G) (1)? N/A

Note: If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 9 of this Tank Systems Checklist.

4. Is the secondary containment provided for the tank system one of the following, as described in 3745-66-93:

a. External Liner? If so,

- | | | |
|---|-------|-------|
| 1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E) (1) (a)] | _____ | _____ |
| 2. Is the liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(E) (1) (b)] | _____ | _____ |
| 3. Is the liner free of cracks and gaps? [3745-66-93(E) (1) (c)] | _____ | _____ |
| 4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93(E) (1) (d)] | _____ | _____ |
| 5. Are chemically resistant water stops in place at all joints? [3745-66-93(E) (1) (e)] | _____ | _____ |
| 6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? [3745-66-93(E) (1) (f)] | _____ | _____ |

b. Vault System? If so,

- | | | |
|--|----|-------|
| 1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E) (2) (a)] | Y | _____ |
| 2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(E) (2) (b)] | Y | _____ |
| 3. Are chemically resistant water stops in place at all joints? [3745-66-93(E) (2) (c)] | Y? | _____ |

Y/N/NA RMK #

4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(E) (2) (d)]
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent against the formation or ignition of vapors? [3745-66-93(E) (2) (e)]
6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(E) (2) (f)]
- c. Doubled-Walled Tank? If so,
 1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(E) (3) (a)]
 2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(E) (3) (b)]
 3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? [3745-66-93(E) (3) (c)]
5. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D) (4) which has been approved by the Director? [3745-66-93(D) (E)]

Y

N/A

N/A

N/A

N/A

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION
(OAC 3745-66-93 (B) (C))

Y/N/NA RMK #

6. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93 (B)]
7. Does the secondary containment system meet the following minimum requirements of 3745-66-93 (C):
 - a. Is it constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93 (C) (1)]
 - b. Is it placed on a foundation or base capable of providing support? [3745-66-93 (C) (2)]
 - c. Is it provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93 (C) (3)]
 - d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93 (C) (4)]
 - e. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93 (C) (4)]

LEDIC
DETECT
DUNE
#1
w/robo

Y

Y

Y

Y

Y

Y

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

ANCILLARY EQUIPMENT REQUIREMENTS (QAC 3745-66-93(F))

Y/N/NA RMK #

8. Is tank system ancillary equipment provided with secondary containment such as double-walled piping, jacketing or trench? [3745-66-93(F)]

Y/N ★

9. If the answer to #8 is NO, is ancillary equipment:

a. Inspected daily? AND;

Y ★

b. Is ancillary equipment one of the following;

i. Above ground piping (exclusive of flanges, joints, valves and connections)?

Y _____

ii. Welded flanges, welded joints and/or welded connections?

N/A _____

iii. Sealless or magnetic coupling pumps and/or sealless valves?

N/A _____

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown devices, and/or loss of pressure-actuated shut-off devices)?

Y
★ _____

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

underground pipe inside pipe inside trench
@ MH gap of secondary containment

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

Y/N/NA RMK #

1. For new tank systems has the o/o obtained a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]

Y _____

Does the written assessment meet the following requirements of OAC 3745-66-92:

- a. Has the assessment been certified by an independent, registered, professional engineer? [3745-66-92(A)]
- b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A) (1)]
- c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-92(A) (2)]
- d. If the external system or components of the system are metal, does the assessment include a evaluation of the system by a corrosion expert to determine the potential of system corrosion? [3745-66-92(A) (3)]
- e. For underground tank components, does the written assessment include a determination of design and operational measures that will be needed to protect the tank system from potential damage? [3745-66-92(A) (4)]
- f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A) (5) (a)]
- g. For tanks situated in a seismic fault zone or saturated zone, does the assessment include design considerations for anchoring the unit to prevent floatation? [3745-66-92(A) (5) (b)]
- h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(A) (5) (c)]

Y _____

Y _____

Y _____

N/A _____

Y _____

Y _____

N/A _____

X _____

REMARKS - NEW TANK SYSTEM ASSESSMENT REQUIREMENTS

Y/N/NA RMK :

2. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]

IN ACCORDANCE WITH OAC 3745-66-92(G), do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]
- b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]?
- c. Proper backfilling? [3745-66-92(C)]
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)]
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]

Y	

REMARKS - NEW TANK SYSTEM REQUIREMENTS

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

Y/N/NA RMK #

1. For existing tank system, without secondary containment that meets 3745-66-93 standards, does the o/o have a written assessment of the tank system on file at the facility which meets all of the following requirements: [3745-66-91(A)(B)]
 - a. Design standards have been considered?
[3745-66-91(B)(1)]
 - b. The characteristics of hazardous waste(s) that have have or will be handled have been considered?
[3745-66-91(B)(2)]
 - c. Corrosion protection measures have been considered?
[3745-66-91(B)(3)]
 - d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)]
 - e. A leak test for non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(a)]
 - f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(b)]
 - g. Is the assessment certified by an independent, registered, professional engineer? [3745-66-91(A)]
2. Have the tests specified in 1e and 1f been conducted annually until secondary containment is provided?
[3745-66-93(I)]
3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)]

N/A

REMARKS - TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS
(OAC 3745-66-94)

Y/N/NA RMK #

1. Does the o/o follow the general operating requirements below: [3745-66-94]
 - a. Does the o/o prevent the placement of hazardous waste or treatment reagents in the tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94 (A)]
 - b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)? [3745-66-94 (B)]
 - c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94 (C)]

Y

Y

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

2. Has the o/o documented the inspections required in 3745-66-95, in the operating record of the facility, including inspection of the following:
 - a. Spill control equipment (daily)? [3745-66-95 (A) (1)]
 - b. Above ground portion of tank (daily)? [3745-66-95 (A) (2)]
 - c. Data from leak detection equipment (daily)? [3745-66-95 (A) (3)]
 - d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95 (A) (4)]
 - e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95 (B) (1)]
 - f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95 (B) (2)]

Y

Y

usuals

Y

N/A

N/A

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES
(OAC 3745-66-98 AND 3745-66-99)

Y/N/NA RMK #

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]
 - a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]
 - OR;
 - b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]
 - OR;
 - c. The tank is used solely for emergencies? [3745-66-98(A)(3)]
2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981)? [3745-66-98(B)]
3. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99]?
 - a. If so, have the requirements of 3745-65-17(B) been met?

REMARKS - IGNITABLE/INCOMPATIBLE WASTE REQUIREMENTS

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS
(OAC 3745-66-991)

Y/N/NA RMK #

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991]

- a. Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)]

N/A

OR;

- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)]

↓

REMARKS - TANK SYSTEM WASTE ANALYSIS REQUIREMENTS

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE
(OAC 3745-66-96)

Y/N/NA RMK #

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ★

If so, did the owner/operator:

- a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]
- d. Immediately conduct a visual inspection of the release? [3745-66-96(C)]
- e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)]
- f. Properly dispose of any visible contamination of the soil or surface water? [3745-66-96(C)(2)]
- g. Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D)(1)(2)]
- h. Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(3)]
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)]
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]

NOTE: The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

★ RA TANK SPILL

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a registered, professional engineer attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]
- i. Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)]
3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E) (1)]
4. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G) (3)]
- i. If soils cannot be removed, has the tank been closed? [3745-66-93(G) (3)]
5. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred and has migrated from the zone of engineering control complied with 3745-66-96(A) through (D) and prevented migration and decontaminated soil? [3745-66-93(G) (4)]

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

OAC 3745-67 SURFACE IMPOUNDMENTS

Y/N/NA RMK #

1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22] _____
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23] _____
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26(A)] _____
4. Is the structural containment system inspected at least once per week? [3745-67-26(B)] _____
5. Are the inspections noted in Question 4 and 5 documented? [3745-65-15(B) (4)] _____

MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS

6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]
 - a. Waste analyses and trial treatment? or; _____
 - b. Written documented information on similar treatment of similar waste under similar conditions? _____
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]
 - a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous? _____
 - b. The waste is managed to protect from ignition? _____
 - c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction? _____

Y/N/NA RMK #

8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30] _____
9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28] _____
10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988? _____
- If no, did USEPA grant an exemption prior to that date? _____

NOTE: If the operator elects not to exempt the surface impoundment from further regulation by removing all waste materials, the surface impoundment is subject to the post-closure care and ground water monitoring requirements specified in 3745-68-10 and 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES

N/A

Y/B/NA RMK #

1. Are waste materials subject to dispersal by wind adequately protected against such dispersal? [3745-67-51] _____
2. If leachate or run-off from a waste pile is a hazardous waste, have the following steps been taken to prevent or properly manage the run-off: [3745-67-53]
 - a. The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage? and; _____
 - b. A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented? and; _____
 - c. A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented? and; _____
 - d. Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event? _____

OR;

 - e. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff? and; _____
 - f. No liquids or wastes containing free liquids are placed in the pile? _____
3. Before new waste materials are added to an existing waste pile, is it first ascertained that the material is compatible with the existing waste through appropriate laboratory testing? [3745-67-52] _____
 - a. Are the results of the analysis maintained in the facility's operating record as required by 3745-65-13? [3745-67-52] _____
4. Before ignitable or reactive wastes are placed in waste piles are one or both of the following met: [3745-67-56]
 - a. The addition to the pile results in a mixture which no longer meets the definition of ignitable or reactive under rules 3745-51-21 or 3745-51-23 and the activity was conducted in compliance with the safety requirements of 3745-65-17? _____

Y/N/NA RMK #

- b. The ignitable or reactive material is physically or otherwise protected from conditions which may cause ignition or reaction? _____
5. Is the waste pile separated or protected from any incompatible materials which may be stored nearby? [3745-67-57(B)] _____
6. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? _____

NOTE: If all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted. [3745-67-58]

REMARKS - WASTE PILE REQUIREMENTS

OAC 3745-67 LAND TREATMENT

N/A

Y/N/NA RMK #

1. Is the hazardous waste which is being managed by land treatment, made less hazardous or nonhazardous by degradation, transformation or immobilization occurring in the soil? [3745-67-72(A)]

2. Are run-off and run-on management systems capable of controlling a 24 hr, 25-yr rain event?
[3745-67-72(B)(C)]

- a. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-67-72(B)]

- b. Are the facilities associated with run-on and run-off systems managed to maintain design capacity after rain events? [3745-67-72(D)]

- c. If the unit is subject to wind dispersal, is it managed to control the dispersal? [3745-67-72(E)]

3. Has the owner/operator determined the following information about the waste being land treated:
[3745-67-73(A)(B)(C)]
a. Levels of EP toxic contaminants exceeding the maximum concentrations in Table I of 3745-51-24?

- b. For wastes listed in 3745-51, the concentrations of constituents causing the waste to be listed?

- c. If food chain crops are grown, the concentrations of arsenic, cadmium, lead and mercury in the waste?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 3745-67-76?

5. Has an unsaturated zone monitoring plan been written, designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste?
[3745-67-78]

- a. Is the plan kept at the facility along with the rationale used to develop it? [3745-67-78(D)]

6. Does the unsaturated zone monitoring plan specify the following minimum information: [3745-67-78]
 - a. Soil monitoring with soil cores?
 - b. Soil pore monitoring?
 - c. The depth of sampling relative to depth of waste incorporation. (Sampling is below depth of waste)?
 - d. Number of soil and soil-pore water samples to be taken?
 - e. Are soil and soil pore water samples analyzed for the hazardous waste constituents that were found in the waste?
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? [3745-67-79]
8. Are ignitable or reactive wastes immediately incorporated into the soil so that they are rendered non-hazardous? [3745-67-81]
9. Are incompatible wastes land treated? (If yes, 3745-65-17 applies)
10. A written closure and post-closure plan is on file at the facility which describes all activities and addresses all of the plan elements required by 3745-66-12, 3745-66-18, and 3745-67-80?
11. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, no later than 60 days after an expected event has occurred which has effected the closure plan? [3745-66-12(C), and 3745-66-18(D)]
12. Has the closure/post-closure plan been submitted to the Director 180 days prior to beginning closure? [3745-66-12(D), and 3745-66-18(E)]
13. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) as required in 3745-66-20?

OAC 3745-68 LANDFILLS

N/A

GENERAL OPERATING REQUIREMENTS

Y/N/NA RMK #

1. Does the facility provide the following:
 - a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)]
 - b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B)]
 - c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)]
 - d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)]
 - e. Control of wind dispersal of hazardous waste? [3745-68-02(D)]

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

REMARKS - LANDFILL GENERAL OPERATING REQUIREMENTS

SURVEYING AND RECORDKEEPING REQUIREMENTS

2. Does the operating record include the following information as required by OAC 3745-68-09:
 - a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)]
 - b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)]

_____	_____
_____	_____

Y/N/NA RMK #

3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12] _____

NOTE: If waste is rendered non-reactive or non-ignitable, see treatment requirements. If not, the provisions of 3745-65-17 and 3745-68-12(b) apply.

4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] If not, the provisions of 3745-68-15 apply. _____
5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] _____
6. Are containers at least 90% full prior to placement in the landfill? _____
7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are no longer present? [3745-68-14(A)] _____
8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)] _____
- a. If yes, has all free liquid been removed, absorbed or otherwise eliminated? _____
9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)] _____
10. Are the special requirements for lab pack waste met? [3745-68-16] _____

REMARKS - SURVEYING AND RECORDKEEPING REQUIREMENTS

LANDFILL CLOSURE AND POST CLOSURE REQUIREMENTS

Y/N/NA RMK #

11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] _____
12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)] _____
13. Has the closure/post-closure plan been submitted to the Director 180 days prior to beginning closure? [3745-66-18(E)] _____
14. Does the plan contain information required in 3745-68-10? _____
15. Is a closure cost estimate available? _____
16. Has closure begun? _____
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) as required in 3745-66-19? _____

REMARKS - LANDFILL CLOSURE/POST-CLOSURE REQUIREMENTS

N/A

OAC 3745-68 INCINERATION AND THERMAL TREATMENT

Y/N/NA RMK #

1. Before adding hazardous waste, is the unit brought to steady state utilizing an auxiliary fuel? [3745-68-73 or 3745-68-45]

a. List type of auxilliary fuel used:

b. Is the process a batch thermal treatment process?

c. Is the unit a boiler, industrial furnace, thermal treatment unit, or incinerator?

d. Does the unit burn waste which is hazardous solely due to ignitability, reactivity, or combustibility?

WASTE ANALYSIS REQUIREMENTS

NOTE: In addition to analyses required under 3745-65-13, the following are minimum requirements for wastes not previously burned/treated [3745-68-41 and 3745-68-75]

2. Is the operator conducting an analysis of any waste which has not been previously burned in the incinerator as required by 3745-68-41?

If so, does the analysis include a determination of the following:

- a. Heating value of the waste? [3745-68-41(A)]
- b. Halogen content of the waste? [3745-68-41(B)]
- c. Sulfur content of the waste? [3745-68-41(B)]
- d. Concentrations of lead and mercury in the waste? [3745-68-41(C)]
- i. If the o/o does not have lead and mercury analysis, is written documentation available to show that these elements are absent from the waste? [3745-68-41(C)]

- e. List other parameters for which the waste is tested to enable the owner/operator to establish steady state or determine the types of pollutants which may be emitted. (Note in remarks any which should be tested.)

3. Are steady state conditions established prior to feeding hazardous waste(s) into the unit for incineration? [3745-68-45 and 3745-68-73]

MONITORING AND INSPECTIONS

4. Is the operator meeting the following monitoring and inspection requirements: [3745-68-47 and 3745-68-77]
- a. Are combustion/emission control instruments monitored at least every 15 minutes? [3745-68-47(A), 68-77(A)]
- b. Is steady state maintained or correction attempted? 3745-68-77(B)
- c. FOR THERMAL TREATMENT ONLY
- i. Is stack plume observed at least hourly for normal color and opacity? [3745-68-77(B)]
- ii. Have these stack plume observations ever shown a plume differet than normal?
- iii. If yes to (2) above, were corrections made to return emissions to normal appearance? [3745-68-77(B)]
- d. Are daily inspections conducted of the unit and all associated equipment to ensure proper operation? [3745-68-77(C)]
- e. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? [3745-68-77(C)]
- f. Are emergency shutdown controls and system alarms checked daily for proper operation? [3745-68-77(C)]

Y/N/NA RMK #

5. At closure, have all hazardous wastes and residues been removed? [3745-68-51 and 3745-68-81] _____
6. Does the owner/operator burn hazardous wastes F020, F021, F023, F026 or F027? _____
- a. If yes, has the unit been certified by the Director [3745-68-52 and 3745-68-83] _____
7. Does the facility open burn or detonate waste explosives within the isolation distances specified in 3745-68-82? _____

REMARKS - INCINERATION/THERMAL TREATMENT REQUIREMENTS

N/A

OAC 3745-53 HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REGISTRATION AND IDENTIFICATION REQUIREMENTS
(OAC 3745-53-11)

Y/N/NA RMK #

1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste? [3745-53-11]

What is the entity's PUCO Number? _____
2. Has the transporter received a U.S. EPA ID number prior to transporting hazardous waste? [3745-53-11(D)]
3. Have all wastes accepted for transport by the transporter been accompanied by a manifest prepared by the generator in accordance with 3745-52? [3745-53-20(C)]
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C)?
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required by 3745-53-20(D)(1) and retained a signed copy for at least 3 years? [3745-53-22(A)]
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?
 - a. In cases where this was not possible, has the transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A)(B)]
7. If hazardous waste has been delivered to rail or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E)(F)?
8. If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)]

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9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control? If so,

a. Was immediate action taken? [3745-53-30(A)]

b. Were all of the notifications made as required by 3745-53-30(C)?

c. Was the discharge cleaned up as required by 3745-53-31?

10. Does the transporter store hazardous wastes temporarily while wastes are in transit? If so, are the following requirements met: [3745-53-12]

a. Are wastes stored for only 10 days or less?

b. Do wastes remain properly DOT packaged during storage?

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulation.

11. Does the transporter import hazardous waste into the United States?

12. Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?

NOTE: A transporter that imports hazardous wastes or mixes wastes as defined in 3745-53-10(c) becomes a generator and is subject to the requirements of 3745-52.

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?

If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):

a. Name, address and USEPA ID # of SQG?

b. Quantity of waste?

c. DOT required shipping information?

d. Date waste accepted?

Y/N/NA RMK #

14. If the transporter receives SQG wastes for transport as described in Question 13, are records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement?
[OAC 3745-53-20 (H) (4)]
-

REMARKS - TRANSPORTER REQUIREMENTS

OAC 3745-58 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY

N/A

Y/N/NA RMK #

1. Does the facility:

- a. Generate hazardous waste fuel?
If so, complete Generator Requirements checklist
- b. Transport hazardous waste fuel?
If so, complete Transporter Requirements checklist
- c. Market hazardous waste fuel?
If so, the facility is subject to 3745-58-45
- d. Burn hazardous waste fuel?
If so, the facility is subject to 3745-58-46

_____	_____
_____	_____
_____	_____
_____	_____

MARKETER AND BURNER REQUIREMENTS (OAC 3745-58-45 AND 3745-58-46)

- 2. Has the marketer/burner filed a Notification of Hazardous Waste Activity Form with the USEPA? [3745-58-45(B)]; [3745-58-46(B)]
- 3. Is hazardous waste fuel stored in containers or tanks?
If so,
 - a. Is the storage for more than 90 days? [3745-58-45(C)] [3745-58-46(C) (D) (E)]
 - b. If 3.a. is yes, did the marketer/burner file a Part A Application for interim status as a storage facility by May 29, 1986?

_____	_____
_____	_____
_____	_____
_____	_____

NOTE: Storage of hazardous waste fuels in containers or tanks is subject to regulation under OAC 3745-52-34 and OAC 3745-65 through 3745-69. Complete applicable checklist(s) for G/TSD/containers/tanks.

MARKETER REQUIREMENTS (OAC 3745-58-45)

- 4. Have shipments of hazardous waste fuel initiated by the marketer been accompanied by completed manifests? [3745-58-45(D)]
- 5. Has the marketer obtained written notice before initiating the first shipment certifying that recipients of the hazardous waste fuel have notified US EPA of their hazardous waste activity and will burn hazardous waste fuel only in boilers or industrial furnaces? [3745-58-45(E), 3745-58-46(F)]

_____	_____
_____	_____

6. Has the marketer provided notice to companies from which he will receive hazardous waste fuel that he has notified USEPA of his hazardous waste activity? [3745-58-45(F)] _____
7. Are copies of the required certifications maintained for 3 years by both the marketer and receiving burner? [3745-58-45(G)] _____
8. Are other applicable recordkeeping requirements under OAC Chapters 3745-52, 3745-54, and 3745-65 maintained by the marketer? _____

HAZARDOUS WASTE BURNER REQUIREMENTS (OAC 3745-58-46)

9. Is hazardous waste burned in appropriate devices as defined by 3745-58-42(B)? _____
10. Did the burner provided a one-time written and signed notice to the marketer certifying that:
 - a. the burner has notified USEPA of its waste-as-fuel activities? _____
 - b. the burner will burn in a boiler or furnace identified in 3745-58-42(B)? _____
11. Are copies of required certification maintained for 3 years by both the marketer and receiving burner? [3745-58-46(G)] _____
12. Are other applicable recordkeeping requirements under OAC 3745-54 through 3745-57; 3745-65 through 3745-69; 3745-56-20 through 3745-56-59 and 3745-67-20 through 3745-67-58 maintained by the marker/burner? _____

REMARKS - HAZARDOUS WASTE BURNER/MARKETER REQUIREMENTS

OAC 3745-58 USED OIL BURNED FOR ENERGY RECOVERY

N/A

Y/N/NA RMK #.

1. Is used oil or used oil fuel being burned for energy recovery in a boiler or industrial furnace?
[3745-58-50(A)]

2. Does the used oil contain more than 1000 ppm total halogens?

If yes, it is regulated as a hazardous waste fuel under 3745-58. [3745-58-50(C)]

3. Is the used oil a hazardous waste solely because it:

- a. Exhibits a characteristic identified under 3745-51?
[3745-58-50(C)]

- b. Contains hazardous waste generated by Conditionally Exempt Small Quantity Generators only? [3745-58-50(D)]

If either 3.a. or 3.b. is yes, the used oil is regulated as a used oil not a hazardous waste fuel.

4. Is the used oil classified as "off-specification" due to exceedances of any of the following allowable levels of constituents: [3745-58-50(E)]

Constituent

Allowable Level

- | | | | |
|-------------------|-----------------------|-------|-------|
| a. Arsenic | 5 ppm maximum | _____ | _____ |
| b. Cadmium | 2 ppm maximum | _____ | _____ |
| c. Chromium | 10 ppm maximum | _____ | _____ |
| d. Lead | 100 ppm maximum | _____ | _____ |
| e. Flash Point | 100 degrees F minimum | _____ | _____ |
| f. Total Halogens | 4,000 ppm maximum | _____ | _____ |

5. If the generator/marketer claims that used oil meets or exceeds specification, does the generator/marketer have analyses of used oil documenting that it meets/exceeds specification? [3745-58-53(B)(1)]

6. If the marketer is handling specification used oil, does he/she maintain an operating log containing the following information: [3745-58-53(B)(7)]

- a. Name and address of facility receiving the shipment?
b. Date of shipment or delivery?
c. Cross-reference to the record of used oil analysis?

7. Are used oil analyses and the operating log kept for a minimum of 3 years? _____

THE FOLLOWING QUESTIONS APPLY ONLY TO MARKETERS/BURNERS OF OFF-SPECIFICATION USED OIL FUEL:

8. Has the marketer filed a Notification or Re-notification of Hazardous Waste Activity with USEPA? [3745-58-53(B) (3)] and [3745-58-54(B)] _____
9. Has the burner of off-specification used oil notified USEPA of his/her used oil management activities (except for oil-fired space heaters described under 3745-58-51(B) (2) (c)? [3745-58-54(B)] _____
10. When the marketer initiates shipment of off-specification used oil, has he/she prepared and sent the receiving facility an invoice containing the following information: [3745-58-53(B) (4)]
- a. An invoice number? _____
- b. The marketer's name, address, and USEPA I.D. No.? _____
- c. The receiving facility's name, address and USEPA I.D. No.? _____
- d. The quantity of off-specification used oil delivered? _____
- e. The date(s) of shipment or delivery? _____
- f. The statement "This used oil is subject to Ohio EPA regulation under Rules 3745-58-50 to 3745-58-54 of the Ohio Administrative Code?" _____
11. Prior to initiating the first shipment of off-specification used oil, has the marketer obtained written notice certifying that recipients have notified USEPA (and if a burner will burn only in industrial furnaces or boilers)? [3745-58-53(B) (5)] _____
12. Before accepting shipments of off-specification used oil from other marketers, has the marketer certified that he/she has notified USEPA of the marketing activity? [3745-58-53(B) (5)] _____

Y/N/NA RMK #

13. Are copies of certifications, invoices and analyses maintained for 3 years? [3745-58-53(B); 3745-58-54(F)]
14. Has the burner certified to marketers from whom he/she receives off-specification oil that he/she has a USEPA I.D. No. and will only burn the used oil in an industrial furnace or boiler identified in 3745-58-51(B)? [3745-58-54(C)]

REMARKS - USED OIL BURNER/MARKETER REQUIREMENTS

Under consideration

OAC 3745-58 RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY

N/A

APPLICABILITY

Y/N/NA RMK #

1. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of any one of the following:

- a. Gold
- b. Silver
- c. Platinum
- d. Palladium
- e. Iridium
- f. Osmium
- g. Rhodium
- h. Ruthenium

If yes, please complete the appropriate checklist(s) below.

GENERATOR REQUIREMENTS (OAC 3745-58-60)

2. If the facility generates recyclable materials as described in question 1.a through 1.h, has the facility notified U.S. EPA of its generation activities? [3745-58-60(B)(1)]?

--	--

3. Is the generator shipping the recyclable materials as described in 1.a through 1.h off-site?

--	--

If so, the generator is subject to the Manifest Requirements of OAC 3745-52-20 through 3745-52-23. Please complete the Manifest Requirements checklist. [3745-58-60(B)(2)]

TRANSPORTER REQUIREMENTS

4. Does the facility transport any recyclable materials that are reclaimed to recover precious metals as identified in question 1.a through 1.h?

--	--

If so, the facility must comply with the Transporter Requirements of OAC 3745-53-20 through 3745-53-23. Please complete the OAC 3745-53 Transporter Requirements checklist. [OAC 3745-58-60(B)(2)]

RECYCLABLE MATERIALS - STORAGE FACILITY REQUIREMENTS

N/A
Y/N/NA RMK #

5. Does the facility store recyclable materials which are reclaimed to recover precious metals as described in question 1.a through 1.h?

If so, is the facility in compliance with the manifest requirements of OAC 3745-65-71 and 3745-65-72?
[3745-58-60(B)(2)]

6. Are records kept containing the following information as required by 3745-56-50(C):

- a. The volume of materials stored at the beginning of the year?
- b. The amount of materials generated or received during the year?
- c. The volume of materials remaining at the end of the year?

7. Do records indicate that the facility speculatively accumulates the materials? (as defined in OAC 3745-51-01(C)(8))

- a. If yes, the facility is subject to 3745-52 to 3745-69 except Chapter 3745-58 and 3745-44 [3745-58-60]]. Please complete the appropriate checklists.

REMARKS - RECYCLABLE MATERIAL GENERATOR, TRANSPORTER, STORAGE FACILITY REQS.

N/A

OAC 3745-58-70 SPENT LEAD ACID BATTERIES BEING RECLAIMED

Y/N/NA RMK #

1. Does the facility reclaim spent batteries and store them before reclaiming them? _____

a. If so, has the facility notified USEPA under Section 3010 of RCRA? _____

Note: In addition to the above, the facility is subject to the applicable provisions of Chapters 3745-55 and 3745-66, Rules 3745-56-20 to 3745-56-59 and 3745-67-20 to 3745-57-57, all provisions of Chapters 3745-54 and 3745-65 except Rules 3745-54-13 and 3745-65-13, 3745-54-71 and 3745-65-71 and 3745-54-72 and 3745-65-72, and all applicable provisions of Rule 3745-50-44. [3745-58-70(B)]. Please complete the appropriate checklists to document compliance with these requirements.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: WCI STEEL, Inc.
USEPA I.D.: 04D 060 409 521 HWFB No.: 02-78-0184
Street: 1040 Pine Ave.
City: Warren State: Ohio Zip: 44483
County: Trumbull Telephone: _____
Fax No: _____ PUCO No.: _____
Owner/Operator: WCI STEEL, INC.
Street: 1040 Pine Ave.
City: Warren State: Ohio Zip: 44483
Telephone: _____ Fax: _____
Inspection Date: 12 / 3 / 92 Time: 9:30 am.

Advance notice of inspection given? (yes) X (no) _____
If so, how far in advance? 3 days

Name	Agency/Title	Phone
Inspectors: <u>Kristen Switzer</u>	<u>Ohio EPA/ESpec II</u>	<u>(216) 963-1107</u>
<u>Tom Roth</u>		
Facility Representative: <u>Tom Shepker</u>	<u>WCI Steel</u>	
<u>Keith McLaughlin</u>	<u>WCI Steel</u>	
<u>Dave Calderwood</u>	<u>WCI Steel</u>	

Cond. Ex. SQG _____ SQG _____ Large Quantity Generator X
Treatment _____ Storage X Disposal _____ Transporter _____
Part A Permit: (yes) X (no) _____ Part B Permit: (yes) _____ (no) X
LDR Checklist Attached: (yes) X (no) _____

ACTIVITIES

Containers _____
Tanks X
Wastepile _____
Landfill _____
Surface Impoundment _____

Used oil burner _____
Hazardous waste fuel burner/blender _____
Incineration/Thermal treatment _____
Land treatment _____
Groundwater monitoring _____

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

The facility generates spent ^{Ko62} pickle liquor from steel production operations. Generated spent pickle liquor is piped to a sump which can be off loaded into 11 storage tanks in a tank farm located next to the sump. The facility accepts spent pickle liquor from off site generators which is also stored in the sump and 11 tanks. The sump and 11 tanks are permitted hazardous waste mgmt. units. The facility regenerates spent pickle liquor to paw acid in an acid regeneration plant for reuse. This process is not regulated under RCRA because it is a reclamation process.

Contingency plan update - name A, removed 12th tank from paperwork
Tank failure - 12th tank which stores regenerated HCl
non-permitted — top broke off
1400 gallons.
will not repair or replace

Turn line acid → transported to acid regen. plant
Galvanize line acid → off-site due to Zn contam.

→ 2-3 mill gal off-site acid

All acid regenerated used at Weir Steel except Dover, Green OH steel co.
(5/29/92)
FINAL

FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

[illegible]

PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK #

1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y _____

When was the owner/operator's Part A submitted:

2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

Y _____

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

NA _____

If yes, what date was the PCR submitted? _____

3. Has the owner/operator submitted a Part B?

Y _____

PERMIT BY RULE REQUIREMENTS

4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

N _____

a. If so, please describe the rule change below:

b. What was the effective date of the rule or statute change in Ohio?

- c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40 (C) (D)?

NA _____

NOTE: In accordance with 3745-50-40 (D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

- d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40 (C) (1) (a)]

NA _____

i. What was the date of notification? _____

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y —

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y —

1990
1991

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A) (1)?
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A) (3) (a)]
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A) (3) (b)]
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B) (1) through (6)]:
- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B) (1)]
- b. The test methods to be used? [3745-65-13(B) (2)]
- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B) (3) (a) (b)]
- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B) (4)]
- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B) (5)]

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

- f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

Y _____

- g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):**

NA _____

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B)(7)]
- ii. The analysis of test data? [3745-65-13(B)(7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)]

Y _____
Y _____
Y _____
Y _____
Y _____

- h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

Y _____
NA _____

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)]
 - b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:
 - i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?
 - ii. The estimated (or actual) weight, volume or density of the waste?
 - iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?
 - c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
 - d. Records of incidents which required implementation of the contingency plan?
 - e. Records of any waste analyses and trial tests required to be performed?
 - f. Records of the inspections required by the general inspection requirements under 3745-65-15?
 - g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?
 - h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]
 - i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

NA —

NA —

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73 (b) (9) through (14)]

Y _____

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71 (A) (1)]

Y _____

4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71 (A)]

Y _____

- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71 (B)]?

NA _____

- b. Are any significant discrepancies in the manifest, as defined in 3745-65-72 (A) noted in writing on the manifest document?

Y _____

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72 (B) or has the o/o submitted the required information to the Director?

NA _____

6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76 (A) been submitted to the Director within 15 days?

NA _____

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15 (A) (1) (2)] If so,

Y / —

a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15 (D)? [3745-65-15 (A)]

Y / —

b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15 (D)? [3745-65-15 (A)]

Y / —

c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15 (D)? [3745-65-15 (A)]

Y / —

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15 (B)] If so,

Y / —

a. Is the schedule kept at the facility? [3745-65-15 (B) (2)]

Y / —

b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15 (B) (3)]

Y / —

c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16 (B) (4)]

Y / —

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

Y _____
Y _____

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -
 - a. A 24-hour surveillance system, or;
 - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

Y _____
Y _____
Y _____

REMARKS - SECURITY REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #

1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?

a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?	Y	
b. A description of how final closure will meet the requirements of 3745-66-11?	Y	
c. An estimate of the maximum amount of hazardous waste ever in inventory?	Y	
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?	Y	
e. The year closure is expected to begin and a schedule for the various phases of closure?	Y	
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?	Y	
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] NA
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)] NA
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)] NA
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] NA
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] NA
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] NA

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16? NA
9. What permitted units at the facility have been closed in accordance with an approved closure plan?
NA
10. If closure was partial, list the regulated units which remain in use at the facility: NA
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] NA
- If so, does the post-closure plan include:
- a. A description of proposed ground water monitoring? ↓
 - b. A description of planned maintenance activities? ↓
 - c. The name, address and phone number of person/office to contact during the post-closure period? ↓
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] NA
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:
- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? NA
 - b. Land use is restricted under closure and post-closure rules? [3745-66-19] ↓

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

NOTE: Tanks used to store or treat wastes containing no free liquids (as determined by the Paint Filter Liquid Test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements of 3745-66-93. Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93.

For generators who accumulate wastes in tanks for less than 90 days, compliance with the closure requirement of 3745-66-97(C) and the waste analysis requirement of 3745-66-991 is not required.

NEW TANK SYSTEM - Installation commencing after July 14, 1986.

EXISTING TANK SYSTEM - Installation or operation commencing on or before July 14, 1986.

Y/N/NA RMK #

1. Is the generator operating any of the following classifications of tank systems for the management of hazardous waste(s):

- a. **New tank system(s)?** If so, _____

Did the o/o install secondary containment meeting the requirements of 3745-66-93 for the unit(s) prior to putting each into service? [3745-66-93 (A) (1)] _____

- b. **Existing tank system(s)** used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so, _____

Did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the tank by January 12, 1989? [3745-66-93 (A) (2)] _____

- c. **Existing tank system(s)** of known, documentable age? _____

- i. If so, has the tank reached 15 years of age?
(yes) _____ (no) _____

If the answer to 1.c.i. above is no, the tank is not required to have secondary containment until the unit reaches 15 years of age.

If the answer to 1.c.i. above is no, when is the unit required to have secondary containment?

If the answer to 1.c.i. above is yes, did the o/o provide secondary containment for the unit when it reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93 (A) (3)] _____

d. Existing tank system(s) for which the age cannot be documented? If so, NA

i. Is the facility greater than 7 years of age?
(yes) _____ (no) _____

If the facility is < 7 years of age, secondary containment for the tank is not required until January 12, 1995.

ii. If the facility is > 7 years of age, is the facility also > 15 years of age?

(yes) _____ (no) _____

If the answer to 1.d.ii above is no, the o/o is not required to provide secondary containment for the tank until the facility reaches 15 years of age.

If the answer to 1.d.ii above is no, when is the secondary containment required for the tank(s)?

If the answer to 1.d.ii. above is yes, did the o/o provide secondary containment for the tank when the facility reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A) (4)]

2. Is the o/o operating a tank system which is used to manage a material that became a hazardous waste after January 12, 1987? If so, NA

a. Has the o/o provided secondary containment meeting the requirements of 3745-66-93 for the unit as required in questions 1.a. through 1.d.? (NOTE: The date the material became a hazardous waste must be used in place of January 12, 1989) [3745-66-93(A) (5)] NA

3. IF THE O/O HAS NOT PROVIDED SECONDARY CONTAINMENT FOR THE TANK SYSTEM(S): Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from the Director in accordance with 3745-66-93(G) (1)? NA

Note: If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 9 of this Tank Systems Checklist.

4. Is the secondary containment provided for the tank system one of the following, as described in 3745-66-93:

a. External Liner? If so,

1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E) (1) (a)]
2. Is the liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(E) (1) (b)]
3. Is the liner free of cracks and gaps? [3745-66-93(E) (1) (c)]
4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93(E) (1) (d)]
5. Are chemically resistant water stops in place at all joints? [3745-66-93(E) (1) (e)]
6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? [3745-66-93(E) (1) (f)]

b. Vault System? If so,

1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E) (2) (a)]
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(E) (2) (b)]
3. Are chemically resistant water stops in place at all joints? [3745-66-93(E) (2) (c)]

Y/N/NA RMK #

- | | | |
|---|--------|-------|
| 4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(E) (2) (d)] | NA | _____ |
| 5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent against the formation or ignition of vapors? [3745-66-93(E) (2) (e)] | | _____ |
| 6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(E) (2) (f)] | ↓ | _____ |
| c. <u>Doubled-Walled Tank?</u> If so, | N | _____ |
| 1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(E) (3) (a)] | NA | _____ |
| 2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(E) (3) (b)] | | _____ |
| 3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? [3745-66-93(E) (3) (c)] | | _____ |
| 5. Is the secondary containment system for the tank(s) an <u>equivalent device</u> as described in 3745-66-93(D) (4) which has been approved by the Director? [3745-66-93(D) (E)] | ↓
N | _____ |

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION
(QAC 3745-66-93 (B) (C))

Y/N/NA RMK #

6. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93 (B)]
7. Does the secondary containment system meet the following minimum requirements of 3745-66-93 (C) :
- a. Is it constructed or lined with compatible materials of sufficient strength to prevent failure?
[3745-66-93 (C) (1)]
- b. Is it placed on a foundation or base capable of providing support? [3745-66-93 (C) (2)]
- c. Is it provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93 (C) (3)]
- d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?
[3745-66-93 (C) (4)]
- e. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?
[3745-66-93 (C) (4)]

Y —

Y —

Y —

Y —

Y —

Y —

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93 (F))

Y/N/NA RMK #

8. Is tank system ancillary equipment provided with secondary containment such as double-walled piping, jacketing or trench? [3745-66-93 (F)]

Y/N _____

9. If the answer to #8 is NO, is ancillary equipment:

a. Inspected daily? AND;

Y _____

b. Is ancillary equipment one of the following;

i. Above ground piping (exclusive of flanges, joints, valves and connections)?

Y _____

ii. Welded flanges, welded joints and/or welded connections?

NA _____

iii. Sealless or magnetic coupling pumps and/or sealless valves?

NA _____

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown devices, and/or loss of pressure-actuated shut-off devices)? *alarm*

Y _____

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

Y/N/NA RMK #

1. For new tank systems has the o/o obtained a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]

Does the written assessment meet the following requirements of OAC 3745-66-92:

- a. Has the assessment been certified by an independent, registered, professional engineer? [3745-66-92(A)]
- b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A) (1)]
- c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-92(A) (2)]
- d. If the external system or components of the system are metal, does the assessment include a evaluation of the system by a corrosion expert to determine the potential of system corrosion? [3745-66-92(A) (3)]
- e. For underground tank components, does the written assessment include a determination of design and operational measures that will be needed to protect the tank system from potential damage? [3745-66-92(A) (4)]
- f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A) (5) (a)]
- g. For tanks situated in a seismic fault zone or saturated zone, does the assessment include design considerations for anchoring the unit to prevent floatation? [3745-66-92(A) (5) (b)]
- h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(A) (5) (c)]

REMARKS - NEW TANK SYSTEM ASSESSMENT REQUIREMENTS

2. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]

Y

IN ACCORDANCE WITH OAC 3745-66-92(G), do the written statements address all of the following:

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]
- b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]?
- c. Proper backfilling? [3745-66-92(C)]
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)]
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]

Y

NA

↓

REMARKS - NEW TANK SYSTEM REQUIREMENTS

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

Y/N/NA RMK #

1. For existing tank system, without secondary containment that meets 3745-66-93 standards, does the o/o have a written assessment of the tank system on file at the facility which meets all of the following requirements: [3745-66-91(A)(B)]

- a. Design standards have been considered?
[3745-66-91(B)(1)]

NA

- b. The characteristics of hazardous waste(s) that have have or will be handled have been considered?
[3745-66-91(B)(2)]

- c. Corrosion protection measures have been considered?
[3745-66-91(B)(3)]

- d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)]

- e. A leak test for non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(a)]

- f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(b)]

- g. Is the assessment certified by an independent, registered, professional engineer? [3745-66-91(A)]

↓

2. Have the tests specified in 1e and 1f been conducted annually until secondary containment is provided?
[3745-66-93(I)]

NA

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)]

NA

REMARKS - TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS
(OAC 3745-66-94)

Y/N/NA RMK #

1. Does the o/o follow the general operating requirements below: [3745-66-94]
 - a. Does the o/o prevent the placement of hazardous waste or treatment reagents in the tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]
 - b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)? [3745-66-94(B)]
 - c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]

Y

Y

NA had spill involving product tank + implem. mented cont. plan

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

2. Has the o/o documented the inspections required in 3745-66-95, in the operating record of the facility, including inspection of the following:
 - a. Spill control equipment (daily)? [3745-66-95(A) (1)]
 - b. Above ground portion of tank (daily)? [3745-66-95(A) (2)]
 - c. Data from leak detection equipment (daily)? [3745-66-95(A) (3)]
 - d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A) (4)]
 - e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B) (1)]
 - f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B) (2)]

Y

Y

Y

Y

Y

Y

NA

↓

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES
(OAC 3745-66-98 AND 3745-66-99)

Y/N/NA RMK #

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]

- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A) (1)]

NA

OR;

- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A) (2)]

NA

OR;

- c. The tank is used solely for emergencies? [3745-66-98(A) (3)]

NA

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981)? [3745-66-98(B)]

NA

3. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99]?

NA

- a. If so, have the requirements of 3745-65-17(B) been met?

↓

REMARKS - IGNITABLE/INCOMPATIBLE WASTE REQUIREMENTS

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS
(OAC 3745-66-991)

Y/N/NA RMK #

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991]

- a. Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)]

NA _____

OR;

- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)]

NA _____

REMARKS - TANK SYSTEM WASTE ANALYSIS REQUIREMENTS

Y/N/NA	RMK #
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<u>N</u>	<u>Product task</u>
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- If so, did the owner/operator:

- [illegible]

TANK SYSTEMS -13-

(5/29/92)
FINAL

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a registered, professional engineer attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]
 - i. Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)]
3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E) (1)]
4. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G) (3)]
 - i. If soils cannot be removed, has the tank been closed? [3745-66-93(G) (3)]
5. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred and has migrated from the zone of engineering control complied with 3745-66-96(A) through (D) and prevented migration and decontaminated soil? [3745-66-93(G) (4)]

NA
↓

NA

NA

NA

NA

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

K062
2006 cadmium

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes, _____

N

(a) List the waste(s) affected:

- (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] _____

NA

(c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes, _____

N

(a) List the waste(s) affected:

- (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] _____

NA

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

N

(a) List the waste(s) affected:

- (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06 (C)]

NA

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

N

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

N

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

N

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

N

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03 (B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS

Y/N/NA RMK#

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]

(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]

(b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?

(b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

N

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

NA

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

NOTIFICATION/CERTIFICATION

Y/N/NA RMK#

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y _____

If so, does the notification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (1) (a); 40 CFR 268.7(a) (1) (i)]

Y _____

- (b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A) (1) (b); 40 CFR 268.7(a) (1) (ii)]

Y _____

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (1) (c); 40 CFR 268.7(a) (1) (iii)]

Y _____

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (1) (d); 40 CFR 268.7(a) (1) (iv)]

Y _____

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A) (1); 40 CFR 268.7(a) (1)]

Y _____

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A) (2); 40 CFR 268.7(a) (2)]

NA _____

If so, does the notice/certification include the following:

- (a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A) (2) (a) (i); 40 CFR 268.7(a) (2) (i) (A)]

NA _____

- (b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (ii); 40 CFR 268.7(a) (2) (i) (B)]

NA _____

- (c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (2) (a) (iii); 40 CFR 268.7(a) (2) (i) (C)]

NA _____

- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (2) (a) (iv); 40 CFR 268.7(a) (2) (i) (D)]

NA _____

- (e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A) (2) (b); 40 CFR 268.7(a) (2) (ii)]

NA _____

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

NA

-

- 7

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT

Y/N/NA RMK#

1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?
- (a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?
- (b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]
2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?
- If so, does the treatment facility test its waste treatment residues according to the following requirements:
- (a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):
- Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B) (1); 40 CFR 268.7(b) (1)]
- (b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):
- Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (3); 40 CFR 268.7(b) (3)]
3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?
- (a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]

NA

NA

NA

NA

NA

NA

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.

Y/N/NA RMK#

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?

NA

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

- (a) EPA hazardous waste number? [3745-59-07(B) (4) (a); 40 CFR 268.7(b) (4) (i)]
- (b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B) (4) (b); 40 CFR 268.7(b) (4) (ii)]
- (c) The manifest number associated with the shipment of waste? [3745-59-07(B) (4) (c); 40 CFR 268.7(b) (4) (iii)]
- (d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B) (4) (d); 40 CFR 268.7(b) (4) (iv)]

NA

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,

NA

For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:

- (a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]
- (b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i))?

NA

For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:

- (c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B) (5); 40 CFR 268.7(b) (5)]

(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B) (5) (b) (40 CFR 268.7(b) (5) (ii)?

NA

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,

NA

(a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B) (6); 40 CFR 268.7(b) (6)]

NA

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?

NA

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

NA

i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D) (1) (a); 40 CFR 268.9(d) (1) (i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D) (1) (b); 40 CFR 268.9(d) (1) (ii)]

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D) (1) (c); 40 CFR 268.9(d) (1) (iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B) (5) (a) (40 CFR 268.7(b) (5) (i)? [O.A.C. Rule 3745-59-09(D) (2); 40 CFR 268.9(d) (2)]

NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

Y/N/NA RMK#

1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C) (1); 40 CFR 268.7(c) (1)]
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]
 - (c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C) (2); 40 CFR 268.7(c) (2)]

NA

NA

Y

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A), (C); 40 CFR 268.40(a), (c)]
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]

NA

NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CBI checklist for additional questions regarding LDR requirements.

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

Y/N/NA RMK#

1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:
- (a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A) (2) (a); 40 CFR 268.4(a) (2) (i)]
- (c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A) (2) (b); 40 CFR 268.4(a) (2) (ii)]
- i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A) (2) (c); 40 CFR 268.7(a) (2) (iii)]
- (d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04(A) (2) (d); 40 CFR 268.4(a) (2) (iv)]
- ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A) (4); 40 CFR 268.4(a) (4)]
- (e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]
- (f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A) (3); 40 CFR 268.4(a) (3)]

N

NA

V

- (g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]

NA

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

Y/N/NA RMK#

1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):

(a) The identification of the contents?

N _____

(a) The identification of the contents?

NA _____

(b) The date which accumulation began?

NA _____

2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):

(a) A description of its contents?

Y _____

(b) The quantity of each hazardous waste received?

N _____

(c) The date each period of accumulation begins? or;

N _____

(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]

N _____

3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,

N _____

(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]

NA _____

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)?
If so,

N

(a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

NA

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

OAC 3745-53 HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REGISTRATION AND IDENTIFICATION REQUIREMENTS
(OAC 3745-53-11)

Y/N/NA RMK #

1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste? [3745-53-11]

N _____

What is the entity's PUCO Number? _____

2. Has the transporter received a US EPA ID number prior to transporting hazardous waste? [3745-53-11(D)]

NA _____

3. Have all wastes accepted for transport by the transporter been accompanied by a manifest prepared by the generator in accordance with 3745-52? [3745-53-20(C)]

4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C)?

5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required by 3745-53-20(D) (1) and retained a signed copy for at least 3 years? [3745-53-22(A)]

6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?

- a. In cases where this was not possible, has the transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A) (B)]

7. If hazardous waste has been delivered to rail or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E) (F)?

8. If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)]

✓ _____

NA

Y/N/NA RMK #

9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control? If so,

a. Was immediate action taken? [3745-53-30(A)]

b. Were all of the notifications made as required by 3745-53-30(C)?

c. Was the discharge cleaned up as required by 3745-53-31?

10. Does the transporter store hazardous wastes temporarily while wastes are in transit? If so, are the following requirements met: [3745-53-12]

a. Are wastes stored for only 10 days or less?

b. Do wastes remain properly DOT packaged during storage?

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulation.

11. Does the transporter import hazardous waste into the United States?

12. Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?

NOTE: A transporter that imports hazardous wastes or mixes wastes as defined in 3745-53-10(c) becomes a generator and is subject to the requirements of 3745-52.

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?

If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):

a. Name, address and US EPA ID # of SQG?

b. Quantity of waste?

c. DOT required shipping information?

d. Date waste accepted?

Y/N/NA RMK #

14. If the transporter receives SQG wastes for transport as described in Question 13, are records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement?
[OAC 3745-53-20 (H) (4)]

NA _____

REMARKS - TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: WARREN CONSOLIDATED INDUSTRIES, INC. Date of Inspection 20 AUG. 1990; 22 AUG.
 Address: 1040 PINE AVE SE HWFB #: 02-78-0184
WARREN, OHIO 44483-6528 USEPA ID #: OH060-409-521
 County: TRUMBULL COUNTY Facility Phone #: (216) 841-8200

Facility Contact: TOM SAEPPER, MGR. ENV. CONTROL Facility Contact Phone #: (216) 841-8200
DAVE CALDERWOOD, SUPV. REG. SERVICES Safety Equipment #: 841-8162
CELIA SEVASTOS, ENV. ENGINEER

INSPECTOR(S) NAME(S): KRIS CODER, EE II
URSULA SCHAEFER, EE II
GORDON GARCIA, U.S. EPA, REGION II, ENVIRONMENTAL PROTECTION
SPECIALIST (S.I.) 886-P09

STATUS

Cond. Ex. SQG ☐ SQG ☐ Generator ☒ Transporter ☐ Treatment ☐ Storage ☒ Disposal ☒

ACTIVITIES

Containers ☐ Tanks ☒ Surface Impoundments ☐ Incineration/Thermal treatment ☐
 Waste pile ☒ Land treatment ☐ Landfill ☐ Groundwater monitoring ☐
 Used oil burner ☐ Hazardous waste fuel burner/blender ☐

- | | Y/N/NA | REMARK # |
|---|------------|----------|
| 1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | |
| 2. Are they : | | |
| a. Abandoned(disposed; incinerated; accumulated, stored, or treated prior to disposal)? | <u>Y</u> | |
| b. Recycled? | <u>N</u> | |
| c. Inherently waste-like?(F020, F021, F022, F023, F026, F028)? | <u>N</u> | |
| 3. If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. Used in a manner constituting disposal? | <u>N/A</u> | |
| b. Burned for energy recovery? | <u>/</u> | |
| c. Reclaimed? (Refer to Table 1 of 3745-51-02) | <u>/</u> | |
| d. Accumulated speculatively? | <u>/</u> | |
| 4. Is the material recycled by being: | | |
| a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>N/A</u> | |
| b. Used as an effective substitute for commercial products? | <u>/</u> | |
| c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>/</u> | |

	<u>Y/N/NA</u>	<u>REMARK #</u>
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	<u>SEE ATTACHED</u>
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	<u>Y</u>	<u>RCRA LAND</u> <u>DISPOSAL RESTR</u> <u>TION INSPECTIO</u>
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	<u>Y</u>	<u> </u>
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	<u>N/A</u>	<u> </u>
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>Y</u>	<u> </u>
10. Has the facility submitted a Part B?	<u>Y</u>	<u> </u>
11. Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u> </u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

FACILITY IS SEEKING A HWFB PERMIT FOR THE STORAGE OF WASTE PICKLE LIQUOR FROM ON-SITE AND OFF-SITE GENERATION. FACILITY STORES WASTE HCL PRIOR TO REGENERATION BOTH FROM OFF-SITE GENERATORS AND ON-SITE GENERATION FROM 5 + 6 PICKLERS. FACILITY REGENERATES APPROX. $8\frac{1}{2}$ MILLION GALLONS OF PICKLE LIQUOR ANNUALLY. RECEIVE ON-SITE 3RD PARTY HCL FROM BY-PRODUCTS (APPROX. 10,000 GALS/DAY). WASTE PICKLE LIQUOR GENERATED AT THE GALVANIZED AND TERN LINES ARE SHIPPED OFF-SITE TO BY-PRODUCTS. FACILITY GENERATES A BAGHOUSE DUST FROM THE GALVANIZED LINE. THIS DUST IS SHIPPED OFF AS A SOLID WASTE. FACILITY HAS AN UNCLOSED WASTEPILE (COAL PILE) WHICH IS BEFORE THE EBR.

3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)? Y _____
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)? N _____
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))? Y NPDES LOW T SYSTEM
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? N _____
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22? Y _____
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)? Y _____
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)? Y _____
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)? Y _____
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? Y _____
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)? Y _____

- | | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|----|--|---------------|-------------------------------|
| 6. | Does the generator meet the following hazardous waste pre-transport requirements: | <u>N/A</u> | |
| a. | Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)? | <u>N/A</u> | |
| b. | Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)? | <u>N/A</u> | |
| c. | Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)? | <u>N/A</u> | |
| 7. | Does the generator import or export hazardous waste? | <u>N/A</u> | |
| | If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)? | <u>N/A</u> | |
| 8. | If the generator elects to accumulate hazardous waste on-site in <u>containers or tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met: | | |
| a. | The containers or tanks are clearly marked with the words "Hazardous Waste"? | <u>N</u> | NEED TO MARK
ACTO SILENTLY |
| b. | The date that accumulation began is clearly marked on each container? | <u>N/A</u> | TANK #5
WITH WORD |
| c. | If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete <u>Management of Containers</u> checklist. | <u>N/A</u> | "HAZARDOUS
WASTE" |

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist. Y _____
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? N/A _____
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? _____
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77? _____
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? _____
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days? N _____
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days? N _____
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? N _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	<u>N</u>	NEED TO TRAIN ARWS. PINKETON + DOCUMENT TRAINING. NEED TO DOCU. TRAINING OF DE LEN.
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	<u>N</u>	FILED 2/28/90
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	<u>Y</u>	
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete <u>"Preparedness and Prevention"</u> and <u>"Contingency Plan and Emergency Procedures"</u> checklists.		

REMARKS, GENERATOR REQUIREMENTS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent
(TCLP)*Yes X No NA Dioxin
(TCLP)Yes No NA X

California List

Yes X No NA
(PFLT and/or total constituent analysis)*

First & Second Third

Yes X No NA
(TCLP and/or total constituent analysis)* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes X No Comments

- a. What date was the waste analysis plan last revised?

JULY 19, 1989

- b. Are analyses conducted on-site or off-site?

 On-site X Off-siteIdentify off-site lab: NUS AND RESEARCH OIL

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes No X NA

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☒ No ☐ NA ☐

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☒ No ☐ NA ☐

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐

Comments

FROM OFF-SITE GENERATORS YES
DID NOT RETAIN NOTIFICATION
AS A GENERATOR.

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☒

Tanks

☐

Containers

☐

Other (Identify inappropriate storage unit(s). _____)

3. Are all containers clearly marked to identify the contents and date(s) entering storage. [268.50(a)(2)]?

Yes ☐ No ☐ NA ☒

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes ☒ No ☐

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes ☐ No ☐ NA ☒

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No ☐ NA ☐

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes ☒ No ☐

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes ☒ No ☐ NA ☐

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes ☐ No ☒ NA ☐

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes ☐ No ☐ NA ☒

If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes ☐ No ☐ NA ☒

- b. More than one year [268.50(f)]?

Yes ☐ No ☐ NA ☐

C. Treatment N/A

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
1	

3. Was dilution used as a substitute for treatment [268.3]?

Yes ___ No ___ Comments _____

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

Yes ___ No ___ Comments _____

Have treatment standards or prohibition levels been met?

Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

- a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

- b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility
_____	_____
_____	_____
_____	_____
_____	_____

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments *N/A*

1. Are prohibited wastes placed in surface impoundments for treatment?
Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)
2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?
Yes ___ No ___
3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?
Yes ___ No ___
4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?
Yes ___ No ___ NA ___
5. Have the Subpart F groundwater monitoring requirements been met?
Yes ___ No ___ NA ___
6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
Yes ___ No ___

Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

Sludge Yes ___ No ___ Waste Code _____

Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

- a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

- b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

- c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site ___ Off-site ___

Identify waste code and treatment method:

Waste Code	Treatment Method
_____	_____
_____	_____
_____	_____

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☐ No ☒

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☐

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☐ No ☐

If yes, at what frequency?

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☐

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☐ No ☐ Comments

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☐

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____



Laboratory Services Group
5350 Campbells Run Road
Pittsburgh, PA 15205

NUS CORPORATION
P.O. Box 630832
Baltimore, MD 21263-0832
412-747-2500

1.

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES
ADDRESS: P. O. BOX 1550
WARREN, OH 44482-1550

NUS CLIENT NO: 0821 0001

VENDOR NO: 10216801
WORK ORDER NO: 55830

REPORT DATE: 08/14/90

ATTENTION: MR. TOM SHEPKER
CC:

SAMPLE IDENTIFICATION: PICKLE LIQUOR # 5 SUGAR TANK AS REC'D
NUS SAMPLE NO: P0138771
DATE SAMPLED : 14-MAY-90
DATE RECEIVED: 15-MAY-90
APPROVED BY: J Simanic

<u>TEST</u>	<u>DETERMINATION</u>	<u>RESULT</u>	<u>UNIT</u>
AASH	Arsenic	< 0.03	mg/L
ABAW	Barium	0.15	mg/L
ACDW	Cadmium	1.6	mg/L
ACRW	Chromium	34	mg/L
APBW	Lead	2.5	mg/L
AHGW	Mercury	< 0.0004	mg/L
ASEW	Selenium	< 0.04	mg/L
AAGW	Silver	0.28	mg/L
AFEW	Iron	100000	mg/L
AZNW	Zinc	7.0	mg/L
I490	pH	< 1	
\$090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	28	mg/L
I590	Solids, Dissolved at 180C	260000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
\$171	Sulfide, Reactive (H2S)	21	mg/L
\$071	Corrositivity, NACE Std TM-01-69	21.1	mm/yr

COMMENTS:



Laboratory Services Group
5350 Campbells Run Road
Pittsburgh, PA 15205

NUS CORPORATION
P.O. Box 630832
Baltimore, MD 21263-0832

412-747-2500

1.

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES

NUS CLIENT NO: 0821 0001

ADDRESS: P. O. BOX 1550

WARREN, OH 44482-1550

VENDOR NO: 10216801

REPORT DATE: 08/14/90

WORK ORDER NO: 55830

ATTENTION: MR. TOM SHEPKER

CC:

SAMPLE IDENTIFICATION: WASTE PICKLE LIQUOR GALVANIZING-TERNE LONE/SUMP AS REC'D

NUS SAMPLE NO: P0138773

DATE SAMPLED : 14-MAY-90

DATE RECEIVED: 15-MAY-90

APPROVED BY: J Simanic

<u>TEST</u>	<u>DETERMINATION</u>	<u>RESULT</u>	<u>UNIT</u>
AASW	Arsenic	0.09	mg/L
ABAW	Barium	0.12*	mg/L
ACDW	Cadmium	1.1	mg/L
ACRW	Chromium	21	mg/L
APBW	Lead	110	mg/L
AHGW	Mercury	0.0009	mg/L
ASEW	Selenium	< 0.04	mg/L
AAGW	Silver	0.17	mg/L
AFEW	Iron	26000	mg/L
AZMW	Zinc	1300 **	mg/L
I490	pH	< 1	
\$090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	6	mg/L
I590	Solids, Dissolved at 180C	260000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
\$171	Sulfide, Reactive (H2S)	110	mg/L
\$071	Corrositivity, NACE Std TM-01-89	101	mm/yr

COMMENTS: * This sample was analyzed as a matrix spike. Recovery of the spike was outside the established acceptance limits. However, the preparation blank and laboratory control sample were found to be in control, indicating the presence of a matrix interference.
** Spike recovery outside acceptance limits; however sample value is 4 times greater than amount of spike added. No corrective action is required.



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1.

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES

NUS CLIENT NO.: 0821 0001

ADDRESS: P. O. BOX 1550
WARREN, OH 44482-1550

VENDOR NO: 10216801

REPORT DATE: 08/14/90

WORK ORDER NO: 55830

ATTENTION: MR. TOM SHEPKER
CC:

SAMPLE IDENTIFICATION: PICKLE LIQUOR * 6 REGENERATION AS REC'D

NUS SAMPLE NO: P0138772

DATE SAMPLED : 14-MAY-90

DATE RECEIVED: 15-MAY-90

APPROVED BY: J Simanic

<u>TEST</u>	<u>DETERMINATION</u>	<u>RESULT</u>	<u>UNIT</u>
AASW	Arsenic	< 0.015	mg/L
ABAW	Barium	0.18	mg/L
ACDW	Cadmium	1.5	mg/L
ACRW	Chromium	13	mg/L
APBW	Lead	2.7	mg/L
AHGW	Mercury	< 0.0004	mg/L
ASEW	Selenium	< 0.02	mg/L
AAGW	Silver	0.26	mg/L
AFEW	Iron	69000	mg/L
AZNW	Zinc	5.3	mg/L
I490	pH	< 1	
\$090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	28	mg/L
I590	Solids, Dissolved at 180C	160000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
\$171	Sulfide, Reactive (H2S)	73	mg/L
\$071	Corrositivity, NACE Std TM-01-69	8.5	mm/yr

COMMENTS:

Gen/Trans/Treat/Store/Disp

U028°
U029
U031
U032
U035
U036
U037
U041
U043
U044
U046
U047
U049
U050
U051
U053
U057
U058°
U059
U060
U061
U062
U063
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U066
U067
U069°
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U073
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U080
U083
U086
U087°
U088°
U089
U092
U093
U094
U095
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U099
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U102°
U103
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U107°
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U163
U164
U165
U168
U169

Gen/Trans/Treat/Store/Disp

U170
U171
U172
U173
U174
U176
U177
U178
U179
U180
U185
U188
U189
U190°
U192
U193
U196
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U218
U219
U220
U221°
U223°
U226
U227
U228
U235°
U237
U238
U239
U244
U248
U249

Gen/Trans/Treat/Store/Disp

U170
U171
U172
U173
U174
U176
U177
U178
U179
U180
U185
U188
U189
U190°
U192
U193
U196
U200
U203
U205
U206
U208
U209
U210
U211
U213
U214
U215
U216
U217
U218
U219
U220
U221°
U223°
U226
U227
U228
U235°
U237
U238
U239
U244
U248
U249

Gen/Trans/Treat/Store/Disp

K085
(NWW - Wash)*
W -
Sol Wash)*
(NWW - Sol Sludge)
(WW - Sol Sludge)
(NWW - Caustic/Water
(WW - Caustic/Water)
K087*
K093*
K094*
K095 (NWW)*
(WW)
K096 (NWW)*
(WW)
K097
K098
K099*
K100 (NWW)*
K101
(NWW - low As)*
(NWW - high As)
(WW)*
K102
(NWW - low As)*
(NWW - high As)
(WW)*
K103*
K104*
K105
K106
K113*
K114*
K115*
K116*
P001
P002
P003
P004

P005
P007
P008
P010
P011
P012
P013*
P014
P015
P016
P018
P020
P021*
P026
P027
P029*
P030*
P036
P037
P039*
P040*
P041*
P043*
P044*
P048
P049
P050
P054
P057
P058
P059
P060
P062*
P063*
P066
P067
P068
P069
P070
P071*
P072
P074*
P081
P082
P084
P085*

Gen/Trans/Treat/Store/Disp

P087
P089*
P092
P094*
P097*
P098*
P099*
P102
P104*
P105
P106*
P107
P108
P109*
P110
P111*
P112
P113
P114
P115
P120
P121*
P122
P123
U002
U003
U005
U007
U008
U009
U010
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U012
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U015
U016
U018
U019
U020
U021
U022
U023
U025
U026

Gen/Trans/Treat/Store/Disp

P087
P089*
P092
P094*
P097*
P098*
P099*
P102
P104*
P105
P106*
P107
P108
P109*
P110
P111*
P112
P113
P114
P115
P120
P121*
P122
P123
U002
U003
U005
U007
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U012
U014
U015
U016
U018
U019
U020
U021
U022
U023
U025
U026

LIST OF RESTRICTED WASTES

CODES:

Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
 No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
 NWW = Non-wastewater
 WW = Wastewater

	Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp
F001*	X / / / / /	F011*	/ / / / /	K037*	/ / / / /
F002*	/ / / / /	F012*	/ / / / /	K038*	/ / / / /
F003*	/ / / / /	<u>F019</u>	/ / / / /	K039*	/ / / / /
F004*	/ / / / /	F024*	/ / / / /	K040*	/ / / / /
F005*	/ / / / /	K001*	/ / / / /	<u>K041</u>	/ / / / /
F020*	/ / / / /	K004	/ / / / /	<u>K042</u>	/ / / / /
F021*	/ / / / /	K005 (NWW)*	/ / / / /	K043*	/ / / / /
F022*	/ / / / /	K007 (NWW)*	/ / / / /	K044*	/ / / / /
F023*	/ / / / /	K008	/ / / / /	K045*	/ / / / /
F026*	/ / / / /	K009*	/ / / / /	K046	/ / / / /
F027*	/ / / / /	K010*	/ / / / /	(NWW - nonreactive)*	/ / / / /
F028*	/ / / / /	K011(NWW)*	/ / / / /	(NWW - reactive)	/ / / / /
<u>Liquid Hazardous Wastes With:</u>		(WW)	/ / / / /	(WW)	/ / / / /
As*	/ / / / /	K013(NWW)*	/ / / / /	K047*	/ / / / /
(500 mg/l)		(WW)	/ / / / /	K048*	/ / / / /
Cd*	/ / / / /	K014(NWW)*	/ / / / /	K049*	/ / / / /
(100 mg/l)		(WW)	/ / / / /	K050*	/ / / / /
Cr VI*	/ / / / /	K015(WW)*	/ / / / /	K051*	/ / / / /
(500 mg/l)		K016*	/ / / / /	K052*	/ / / / /
Pb*	/ / / / /	<u>K017</u>	/ / / / /	K060(NWW)*	/ / / / /
(500 mg/l)		K018*	/ / / / /	(WW)	/ / / / /
Hg*	/ / / / /	K019*	/ / / / /	K061	/ / / / /
(20 mg/l)		K020*	/ / / / /	(NWW - low zinc)*	/ / / / /
Ni*	/ / / / /	K021(NWW)*	/ / / / /	(NWW - high zinc)*	/ / / / /
(134 mg/l)		(WW)	/ / / / /	(WW)	/ / / / /
Se*	/ / / / /	K022(NWW)*	/ / / / /	K062*	X / / / X /
(100 mg/l)		(WW)	/ / / / /	K069	/ / / / /
Ti*	/ / / / /	K023*	/ / / / /	(NWW - nonCaSO ₄)*	/ / / / /
(130 mg/l)		K024*	/ / / / /	(NWW - CaSO ₄)	/ / / / /
pH* ≤ 2.0	X / / / X /	K025(NWW)*	/ / / / /	(WW)	/ / / / /
PCBs*	/ / / / /	(WW)	/ / / / /	K071*	/ / / / /
≥ 50 ppm		K027*	/ / / / /	<u>K073</u>	/ / / / /
<u>Hazardous Wastes with:</u>		K028*	/ / / / /	K083 (WW)	/ / / / /
HOCs*	/ / / / /	K029(NWW)*	/ / / / /	<u>K084</u>	/ / / / /
≥ 1,000 mg/l		(WW)	/ / / / /	<u>K085</u>	/ / / / /
≥ 1,000 mg/kg		K030*	/ / / / /		
F006 (NWW)*	/ / / / /	<u>K031</u>	/ / / / /		
(WW)	/ / / / /	<u>K035</u>	/ / / / /		
F007*	/ / / / /	K036*	/ / / / /		
F008*	/ / / / /				
F009*	/ / / / /				
F010*	/ / / / /				

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: WARREN CONSOLIDATED INDUSTRIES, INC.

U.S. EPA I.D. No. : OH D 060-409-521

Street: 1040 PINE AVE S. E.

City: WARREN State: OH Zip: 44483

Telephone: (216) 841-8200

Owner/Operator:

Street: SAME AS ABOVE

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 20 AUG. 90 AND 22 / AUG / 90 Time: 10-00

Weather Conditions: FAIR / CLOUDY

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>KRIS CODER</u>	<u>DEPA, EE II</u>	<u>(216) 425-9171</u>
	<u>URSULA SCHALK</u>	<u>DEPA, EE II</u>	<u>(216) 425-9171</u>
Facility Representative:	<u>GORDON GARCIA</u>	<u>U.S. EPA, ENVIRONMENTAL PROTECTION SPECIALIST</u>	<u>(312) 886-8097</u>
	<u>TOM SHEPHER</u>	<u>MGR, ENV. CONTROL</u>	<u>(216) 841-8200</u>
	<u>DAVE CALDERWOOD</u>	<u>SUPV. REGENERATION SERVICES</u>	<u>(216) 841-8735</u>
	<u>CELIA SEVASTOS</u>	<u>ENV. ENGINEER</u>	<u>(216) 841-8162</u>

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>X</u>	_____	_____	_____	_____
Dioxin	_____	_____	_____	_____	_____
California List	<u>X</u>	_____	_____	<u>X</u>	_____
First Third	<u>X</u>	_____	_____	<u>X</u>	_____
Second Third	_____	_____	_____	_____	_____

INSPECTION SUMMARY

Processes That Generate LDR Wastes

PICKLING AND COATING OPERATIONS AS A
PRIMARY STEEL PRODUCER.

LDR Waste Management

PICKLE LIQUOR IS GENERATED ON-SITE, PIPED
TO CENTRAL LOCATIONS AND EITHER REGENERATED
ON-SITE TO SHIPPED OFF-SITE FOR
DISPOSAL, OFF-SITE RECEIPT OF PICKLE
LIQUOR AMOUNTS TO APPROX. 15%.
RECEIVE OFF-SITE PICKLE LIQUOR FOR
REGENERATION.

Summary

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List* _____

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* K062

d. First and Second Third Wastes

Yes ☒ No ☐ List* K062

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ___ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ___ No ☒ Comments _____

GENERATOR REQUIREMENTS

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes Y No NA

If yes, check the appropriate treatability group.

Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)

X All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes X No NA

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
K062		X

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes No NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No X NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No X NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No X Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes X No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

K062 WASTE PICKLE, WHEN GENERATED
FOOT WASTE OILS.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes X No

- TCLP Yes No X NA

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes X No NA

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

8/14/90 ; SEMI-ANNUAL FREQUENCY, ATTACHED
TEST RESULTS.

- pH ≤ 2 Yes X No NA

List the wastes for which pH testing was used.

K062 - PICKLE LIQUOR #5 SURGTANK; PICKLE LIQUOR

- Paint Filter Liquid Test Yes No X NA

List the wastes for which PFLT was used.

2.. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes No X NA

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes X No Comments _____

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes X No (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
K062	BY-PRODUCTS AND MILL SERVICES	BY-PRODUCTS-STORES / MILL SERVICES-TREATS & S
F001	RESEARCH OIL	STORE

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes X No

- Does notification contain the following?

EPA Hazardous waste number(s) Yes X No

Applicable treatment standards and prohibition levels Yes X No

Manifest number Yes X No

Waste analysis data, if available Yes X No ONLY ON REQUEST.

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes No X (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

N/A

- Does notification contain the following? N/A

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ___ N/A (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iii)	Manifest number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iv)	Waste analysis data, if available	Yes <input type="checkbox"/>	No <input type="checkbox"/>

3. "Soft Hammer" Demonstrations/Certifications *N/A*

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☐ No ☐

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☐ No ☐

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☐ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☐ No ☐

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

Addresses	Yes <input type="checkbox"/>	No <input type="checkbox"/>
-----------	------------------------------	-----------------------------

Telephone numbers	Yes <input type="checkbox"/>	No <input type="checkbox"/>
-------------------	------------------------------	-----------------------------

Contact dates	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---------------	------------------------------	-----------------------------

Certification statement	Yes <input type="checkbox"/>	No <input type="checkbox"/>
-------------------------	------------------------------	-----------------------------

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☐ No ☒ Comments ALSO SEE COMMENT UNDER
TSD REQUIREMENTS, PAGE 2.

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☒ NA ☐ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u>Y</u>	
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	<u>Y</u>	CONCERN IS THAT PLAN BE ORGANIZED TO INCLUDE FREE OF ANALYSIS. THIS INFO IS AVAILABLE BUT IS IN CONT. PL
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>Y</u>	
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u>Y</u>	
IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.			
4.	Does the facility have -		
	a. A 24-hour surveillance system, or	<u>Y</u>	
	b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	<u>Y</u>	
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	<u>Y</u>	
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>N</u>	NEED TO REVISE INSPECTION FORMS FOR REMEDIAL ACTION TO REMOVE LIQUID OR PRECIPITATE FROM SECONDARY CONTAINMENT. ALSO SUMPS IN 24 HRS. A.S.A.P.
AND CAL 3745-66-93(C)(4)			

Y/N/NA REMARK #

- b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)
- a. Protection from sources of ignition.
- b. Physical separation of incompatible waste materials.
- c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
- d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))

Y _____

N SEE PREVIOUS
COMMENTS

N _____

N/A _____

3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	Y/N/NA	REMARK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	
2. Has there been a fire, explosion or non-planned release of waste at the facility? (RELEASE TO SECONDARY CONTAINMENT)	<u>Y</u>	RELEASE DATE GALVANIZED
a. If yes, has the contingency plan been implemented?	<u>N/A</u>	<u>SUMP</u> SECOND CONTAINMENT ON 20 AUG. 90
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)	<u>N/A</u>	TO BE FOLLOWED UP W/ A
a. Internal alarm system?	<u>Y</u>	REPORT +
b. Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	CERTIFICATION
c. Portable fire control equipment?	<u>Y</u>	OF REPAIR
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	IN-PLANT FIRE MARSHALL.
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>Y</u>	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

N/A _____

3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y
 - b. Arrangements or agreements with local or state emergency authorities? Y NEED TO BE PART OF PLAN
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? N NEED TO REVISIT
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? N
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))? N/A
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) Y
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) N
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) N

3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)). Y _____
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste? Y _____
 - c. The estimated (or actual) weight, volume or density of the waste material? Y _____
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2) Y _____
 - e. The present physical location of each hazardous waste within the facility? Y _____
 - f. Records of incidents which require implementation of the Contingency Plan? Y _____
 - g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2)). N/A _____
 - h. Records of any waste analyses and trial tests required to be performed? Y _____
 - i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)? Y _____
 - j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))? Y _____

	<u>Y/N/NA</u>	<u>REMARK #</u>
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>Y</u>	<u> </u>
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	<u>Y</u>	<u>FILED</u> <u>2/28/90</u>
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	<u>N/A</u>	<u> </u>
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	<u> </u>	<u> </u>
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	<u> </u>	<u> </u>
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	<u> </u>	<u> </u>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u> </u>	<u> </u>

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

N/A

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

- C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat wastes containing no free liquids (confirmed by the paint filter liquid test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements 3745-66-93 (265.193).

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with 3745-66-97(C) and OAC 3745-66-991 (265.191) (265.197) is not required.

Y/N/NA REMARK #

1. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Administrator/Director. If yes, skip items 2 through 6. N/A
2. Has the o/o installed secondary containment which meets the requirements of 3745-66-93 (265.193) for each of the following classes of tank systems by the date specified.
[3745-66-93(A)] (265.193)
 - a. For all new tank systems prior to being put into service. Y
 - b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989. N/A
 - c. For existing tank system of known and documentable age, the latter of January 12, 1989, or when the tank reaches 15 years of age. N/A
 - d. For existing tank systems of undocumentable age, by January 12, 1995 or, if the facility was built prior to January 12, 1980, the latter of (1) when facility reaches 15 years of age or (2) January 12, 1989.
 - e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989. N/A

Note: If the tank system has no secondary containment, skip to #7.

3. Was the secondary containment system(s) at the facility designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids . [3745-66-93(B)] (265.193(b)) Y _____
4. At a minimum is the secondary containment system: [3745-66-93(C)] (265.193(c))
- a. Constructed or lined with compatible materials with sufficient strength to prevent failure. Y _____
- b. Placed on a foundation or base capable of providing support. Y _____
- c. Provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours of at earliest practicable time is provided. Y _____
- d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation and is liquid removed within 24 hours or in a timely manner. Y _____
5. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? [3745-66-93(D)(E)] (265.193(d)(e)) Y _____
- a. External Liner
1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? Y _____
2. Is the external liner designed and operated to prevent run-on and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Y _____

	<u>Y/N/NA</u>	<u>REMARK #</u>
3. Is the exterior liner free of cracks and gaps?	<u>Y</u>	_____
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	<u>Y</u>	_____
 b. <u>Vault System</u>		
1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?	<u>N/A</u>	_____
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?		_____
3. Are chemically resistant water stops in place at all joints?		_____
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?		_____
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?		_____
6. Is the vault system provided with an exterior moisture barrier?		_____
 c. <u>Doubled-Walled Tank</u>		
1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	<u>N/A</u>	_____
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?		_____
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?		_____

		<u>Y/N/NA</u>	<u>REMARK #</u>
6.	Is ancillary equipment including above ground piping, welded flanges and joints, sealless pumps and valves, provided with secondary containment (e.g., double-walled piping, jacketing, trench)?	<u>Y</u>	_____
	a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))	<u>Y</u>	_____
7.	For existing tank system, without secondary containment that meets 3745-66-93 (265.193) standards, does the o/o have a written assessment certified by an independent P.E. that includes all of the following: [3745-66-91(A)(B)] (265.191(a)(b))	<u>N/A</u>	_____
	a. Design standards?		_____
	b. The characteristics of hazardous waste(s) that have been or will be handled?		_____
	c. Corrosion protection measures?		_____
	d. The age of the tank system has been estimated or documented?		_____
	e. A leak test for non-enterable underground tanks?		_____
	f. A leak test or an internal inspection by qualified P.E. for <u>other than</u> non-enterable underground tanks?		_____
8.	Have the tests specified in 7f and 7g been conducted annually until secondary containment is provided [3745-66-93(I)(4)] (265.193(4)):		_____
9.	For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))	<u>N/A</u>	_____
10.	For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	<u>N/A</u>	_____

11. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 (see #18) [3745-66-91(D)] (265.191(d) and [3745-66-93(I)] (265.193(i)(4))

N/A _____

12. For new tank systems, (constructed began after July 14, 1986) has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following: [3745-66-92(A)] (265.192(a))

- a. Design standards
- b. The characteristics of hazardous waste to be stored or treated
- c. Corrosion protection for tank systems in contact with soil or water
- d. Protection from vehicular traffic for underground tanks
- e. Adequacy of tank foundation, proper anchoring and effects of frost heave

Y _____
Y _____
Y _____
Y _____
Y _____

13. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:

- a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))
- b. Proper backfilling; [3745-66-92(C)] (265.192(c))
- c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))
- d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))
- e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))

Y _____
Y _____
Y _____
Y _____
Y _____

14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) and decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed [3745-66-93(G)(3)] (265.193(g)(3))
15. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (265.193(g)(4)(i) and (ii)? See #18
16. Does the o/o follow the general operating requirements below:
[3745-66-94] (265.194)
- a. Hazardous waste or treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.
 - b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)
 - c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.
17. Has the o/o documented the inspections required in 3745-66-95 (265.195), in the operating record of the facility, including the following:
- a. Spill control equipment (daily).
 - b. Above ground portion of the tank (daily).
 - c. Data from leak detection equipment (daily).
 - d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).

N/A

N/A

Y

Y

Y

Y

Y

Y

Y

Y/N/NA REMARK #

- e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.
- f. All sources of impressed current at least bi-monthly.

N/A _____
1 _____

18. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

- a. Immediately ceased flow into tank and investigated cause of release
- b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.
- c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.
- d. Immediately conducted a visual inspection of the release and prevent further migration and removed and disposed of any visible contamination of soil or surface water.
- e. Reported any release to the environment to the Director (Regional Administrator) within 24 hour unless it is less than 1 lb. and was cleaned up immediately.
- f. Submitted a report within 30 days of the release to Director (Regional Administrator).

Y PER LETTER
Y DATED AUG.
28, 1990
Y _____
Y _____
N/A NO RELEASE
Y TO THE
ENVIRONMENT.

19. If a release has occurred from the tank system have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))

- a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.
- b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.

N/A _____
Y _____

Y/N/NA REMARK #

- c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.
 - d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?
 - e. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).
20. If the requirements if #17 have not been met, has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?
21. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))
- a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or
 - b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or
 - c. The tank is used solely for emergencies.
22. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management area and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981): [3745-66-98(B)] (265.198(b))

N/A _____

N/A _____

Y _____

N/A _____

N/A _____

I _____

N/A _____

Y/N/NA REMARK

23. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99] (265.199)?

N/A _____
1 _____

a. If so, have the requirements of 3745-65-17(B) (265.17(b)) been met?

24. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] (265.200)

a. Conducted waste analysis and trial treatment storage tests.
b. Obtained written documentation on similar waste under similar operating conditions.

N/A _____
1 _____

3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	<u>Y*</u>	<u>THE LATEST</u>
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.111.		<u>REVISION</u>
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).		<u>IS MAY 1989</u>
c.	An estimate of the maximum amount of hazardous waste ever in inventory.		<u>SUBMITTED A</u>
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.		<u>PART OF THE</u>
e.	The year closure is expected to begin and a schedule for the various phases of closure.		<u>FACILITY'S</u>
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.		<u>PART B.</u>
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))		
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))		
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))		

X A THOROUGH REVIEW OF THIS ^{- 30 -} PLAN WAS NOT DONE AS PART OF THIS INSPECTION. TECHNICAL ADEQUACY OF THE PLAN IS BEING DONE THROUGH THE REVIEW OF THE FACILITY'S PART B APPLICATION. CLOSURE OF THE COAL PILE (WASTE PILE) IS STILL AN ISSUE BEFORE THE EBR (ENVIRONMENTAL BOARD OF REVIEW).

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	_____	_____
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	_____	_____
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	_____	_____
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plan in accordance with OAC 3745-66-16?	_____	_____
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	_____	_____
10.	If closure was partial, list the regulated units which remain in use at the facility: _____ _____		
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	_____	_____
12.	Does the post-closure plan include:		
a.	A description of proposed ground water monitoring?	_____	_____
b.	A description of planned maintenance activities?	_____	_____
c.	The name, address and phone number of person/office to contact during the post-closure period?	_____	_____

<u>Y/N/NA</u>	<u>REMARK #</u>
---------------	-----------------

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:
 - a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
 - b. Land use is restricted pursuant to 3745-66-17?
[3745-66-19] (265.119)

CAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L)

Y/N/NA REMARK #

1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251) N
2. If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)
 - a. (1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and N
 - (2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and N
 - (3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and N
 - (4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; N
or
 - b. (1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and N
 - (2) No liquids or wastes containing free liquids are placed in the pile. N/A
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252) N/A

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X SEE PREVIOUS COMMENT CONCERNING CLOSURE OF WASTE PILE (COAL PILE).

4. Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met:
[3745-67-56] (265.256)
- a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b))
- b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.
5. Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a))
6. Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them?
[3745-67-57(B)] (265.257(b))
7. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted)
[3745-67-58] (265.258)

N/A	



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Cincinnati, Ohio 44087-1969
(616) 425-9171
FAX (216) 487-0769

Richard F. Celeste
Governor

RECEIVED

SEP 20 1990

OHIO EPA
DIV OF SOLID &
HAZ WASTE MGMT

September 18, 1990

CERTIFIED MAIL

Thomas Shepker
Manager, Environmental Control
Warren Consolidated Industries, Inc.
1040 Pine Avenue, S.E.
Warren, OH 44483-6528

RE: Warren Consolidated
Industries, Inc.
Trumbull County
02-78-0184
OHD 060-409-521
Generator, Storage and
Disposal Facility

Dear Mr. Shepker:

On August 20th and 22nd, 1990, I conducted a hazardous waste inspection of Warren Consolidated Industries, Inc., located at 1040 Pine Avenue, S.E., Warren.

Ursula Schaler and Gordon Garcia, U.S. EPA Region V, accompanied me on the first day of the inspection. You, Dave Calderwood and Celia Sevastos represented the facility during the inspection. The facility was inspected for compliance to both Ohio and Federal hazardous waste regulations. Enclosed is a copy of the RCRA Interim Status Inspection Form. Also, enclosed is a copy of the RCRA Land Disposal Restriction Inspection Checklist. A copy of this checklist is being forwarded to the U.S. EPA, Region V for appropriate follow-up.

During the inspection the following violations were noted. These violations need your immediate attention:

- 1.) OAC 3745-52-34, accumulation time of hazardous waste:

The facility failed to clearly mark the #5 silicon tank with the words "Hazardous Waste", which is a violation of OAC 3745-52-34. Although the facility is seeking to permit this tank as part of its Hazardous Waste Facility Board Part B permit application, the tank must be managed as a less than 90 day accumulation tank since this tank did not appear on the facility's original Hazardous Waste Facility Board Permit.

Please document compliance by providing a photograph of the tank with the hazardous waste marking.

Page - 2 -
Thomas Shepker
September 18, 1990

- 2.) OAC 3745-65-16, Personnel Training and Employee Training Records:

The facility failed to provide hazardous waste training for Arwood Pinkerton, which is a violation of OAC 3745-65-16. The facility failed to have adequate training records documenting that Joe Len received annual hazardous waste training, which is a violation of OAC 3745-65-16.

To document compliance, the facility must provide hazardous waste training for Arwood Pinkerton and provide me with a copy of the record(s) documenting his training. The facility must also provide me with a copy of the hazardous waste training record(s) for Joe Len.

- 3.) OAC 3745-65-15, General Inspection Requirements;
OAC 3745-66-93 (C) (4), Containment and Detection of Releases:

The facility is to revise the inspection logs in the waste pickle liquor accumulation areas to include the remedial actions necessary to remove liquids and precipitation from the tank secondary containment systems. OAC 3745-66-93 (C) (4) requires the facility to remove liquids from the secondary containment systems, resulting from spills, leaks or precipitation, within 24 hours or in a timely manner as is possible. Warren Consolidated Industries' inspection logs failed to provide this information, which is a violation of OAC 3745-65-15 and OAC 3745-66-93 (C) (4).

Please document compliance by providing a copy of the revised inspection log(s) showing the timely removal of liquids from the secondary containment systems.

- 4.) OAC 3745-65-54, Amendment of Contingency Plan;
OAC 3745-65-52, Content of Contingency Plan:

The facility failed to amend the list of Emergency Coordinators, which is a violation of OAC 3745-65-54. The Contingency Plan failed to include a list of all emergency equipment, its location and physical description and capabilities, which is a violation of OAC 3745-65-52.

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Thomas Shepker
September 18, 1990

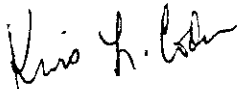
The facility is to document compliance by amending the Contingency Plan to include the change in Emergency Coordinators and to include the addition of lime or soda ash to the list of emergency equipment. Also, the amended plan must include the location(s) of the lime or soda ash storage area(s). The plan must also include the location of all emergency equipment and a brief outline of its capabilities. As an additional concern and even though the facility has the agreements/arrangements with the local and state authorities, the facility must make these agreements and arrangements a part of the Contingency Plan. As required by OAC 3745-65-53, all revisions to the Contingency Plan must be submitted to all local and state authorities.

Please, within 30 days of receipt of this letter, document to my attention corrections to the above referenced violations. Please note that I did not inspect your facility for compliance to the Financial Liability Requirements.

One additional concern remains. The facility's waste analysis plan needs to be better organized. The frequency of analysis of all waste streams was available for review in the Contingency Plan. This information should be removed from the Contingency Plan and added to the Waste Analysis Plan.

Even though we discussed all of these violations and concerns, please feel free to call me if you have any questions.

Sincerely,



Kris L. Coder
Environmental Scientist
Division of Solid and Hazardous Management

Enclosures

KLC.wb

cc: ~~Carolyn Referson~~, CO, DSHWM



FIELD INSPECTION REPORT

DATE OF INSPECTION: 10/7/92

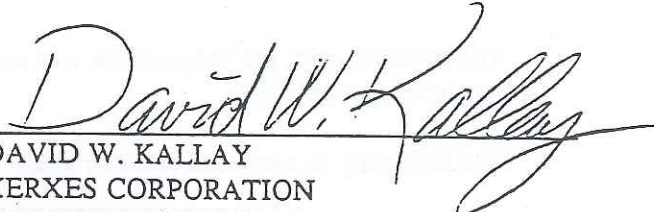
CUSTOMER: WCI STEEL
1040 PINE AVE
WARREN, OHIO 44483-6528

PROJECT: INSPECTION OF #6 PKLR

CUSTOMER P.O. 346141.
XERXES CORP. S.O. 47925

CONTACTS AT SIGHT: STEVE HANUSCIN

REPORT CERTIFIED BY:


DAVID W. KALLAY
XERXES CORPORATION
PRODUCT SERVICES MANAGER

OBSERVATIONS & MEASUREMENTS:

- Heil model 749-3 scrubber with two Heil model HCL-42 fans. Scrubber and south fan were purchased on Xerxes S. O. 36865 (1983), while north fan was replaced on S. O. 45140 (1989). Original design specifications:
 - gas volume: 30,000 cfm
 - temperature: 180°F (max.)
 - system (fan) static pressure: 6.75" wg
 - scrubber once through liquid rate (top): 15 gpm
 - scrubber both tray spray: 16 gpm @ 10 PSIG
 - scrubber pressure drop: 4.0" wg
- Gas volume measured at the discharge of the north fan was 25,590 cfm with an average gas velocity of 2660 fpm. The duct diameter at the location of measurement is 42" ID (cross sectional area of duct 9.621 ft²).
- Fan RPM was measured and found to be 965 rpm. The fan inlet static pressure plus the outlet static pressure is the system (fan) static pressure. The inlet pressure was approximately 7.0" wg, while the outlet pressure was 0.4" wg. The total system pressure is then 7.4" wg.
- The scrubber pressure drop is the difference in the scrubber inlet static pressure and the outlet static pressure. The inlet static pressure was 1.6" wg, while the outlet static pressure was 6.9" wg. The pressure drop across the scrubber is then 5.3" wg.
- The scrubber inlet gas temperature was measured to be 114°F, while the outlet temperature was 108°F.
- The following is a table of the hydrochloric acid fume concentrations measured:

TIME	INLET CONCEN. (PPM)	OUTLET CONCEN. (PPM)	EFFICIENCY (%)
10:30 AM	200	<0.5 ND	>99.75
10:40 AM	200	<0.5	99.75
10:50 AM	300	<0.5	99.83
11:15 AM	200	<0.5 ND	>99.75
11:30 AM*	200	1.0	99.50
11:40 PM*	200	0.5	99.75
11:50 PM*	200	<0.5 ND	>99.75
12:00 PM**	200	<0.5 ND	>99.75
12:10 PM**	200	<0.5 ND	>99.75

*-Bottom spray turned OFF

** -Bottom spray turned back on;

ND-outlet concentration Not Detectable

- While bottom spray was operating, a pressure gauge measured the pressure at ~10 PSIG.
- The top water inlet had a liquid flow of between 15-16 gpm.
- New trays, 4-bend mist eliminator, and spool section were added to the scrubber since the inspection by Xerxes on August 8, 1992. Also, a new bottom section was added to the stack and a section of duct was added to the scrubber discharge duct. Four new 3" dia ports were added to the scrubber inlet duct work.
- The stack and scrubber drain piping have not been modified per our recommendations in the previous mentioned report.
- A small centrifugal pump was drawing the liquid out of the scrubber sump and stack drain and therefore liquid was not flowing out of the overflow stand pipe into the open drain next to the scrubber. There was liquid in the stand pipe slowly rising and falling by 1-2 inches. From the stand pipe it could be estimated that there was 10 to 12 inches of liquid in the scrubber sump.
- The original mist eliminator was found next to the scrubber and approximately 30-40% of the blades were broken or not usable. Also beside the scrubber was the tray material that was replaced. The perforated plates were in tacked but had deformed by 1-2".
- As in the first inspection, fume capture along the pickle tanks was excellent. A 3' long section of the pickle tank hoods was missing but no apparent fumes were escaping. The fumes were being drawn back under the hoods.
- The outboard bearing on the North fan was making a great deal of noise. The inboard bearing, the bearing nearest the impeller housing, was much less noisy.

CONCLUSIONS:

The reason for the scrubber systems lower than design gas flow starts with the fan is pulling or pushing the gas against a greater force than designed. The design force or system static pressure is 6.75" wg but the measured system pressure the fan works against is 7.4" wg. So the next question is where is the additional static pressure coming from? The likely answer is the scrubber. The design static pressure drop across the scrubber is 4" wg but it was measured to be 5.3" wg. The additional 1.3" wg pressure drop across the scrubber is reducing your air flow by ~14%. The lower air flow does not seem to be adversely affecting the system's ability to capture the acid fumes on the line. Changing the mist eliminator and having the correct amount of liquid on each tray may be the reason the air flow has decreased. Also the gas entering the scrubber on this day was slightly warmer. The warmer and the more liquid it carries the greater the system static pressure and thus the lower the air flow.

The expected removal efficiency of your scrubber for HCl using three trays is 98%. Presently the scrubber is operating just significantly higher than the expected efficiency. Replacing the trays and having the correct amount of liquid evenly distributed across them significantly increased the removal efficiency.

The scrubber had a very slight drop in removal efficiency when the bottom tray spray was turned off. It would be up to WCI if they what operate the scrubber with the spray on, since there is no significant difference if the spray is operating or not.

It will be very important to replace the outboard fan bearing before the bearing either deforms the fan shaft or burns up and locks up. The bearings have a great deal of grease at the greasing ports which suggests over greasing. The Dodge double interlock bearings only need 2 or 3 shots of grease every two weeks. The bearings will not last if they are over greased or under greased or greased infrequently with too much grease.

XERXES FIBERGLASS
34250 Mills Road, Avon, Ohio 44011
Telephone: (216) 327-6051

HCL-42

30,000
CFM

25,000

Design

OPERATING

Design 6.75
WG

7.4
WG

965

WCI-R 004019



XERXES®
CORPORATION

MATTHEW D. BIESTERVELD, E.I.T.
Applications Engineer

34250 Mills Road
Avon, Ohio 44011

(440) 327-6051
FAX (440) 327-7088

WCI Steel
Rolling & Finishing
Gate #1, Door #44
1040 Pine Ave. SE
Warren, Ohio 44483-6528
Attention: Mr. John Rinda

Fax: (330) 841-8625

Reference: #5 and #6 Pickle Line Fume Exhaust Scrubbers Testing

Dear Mr. Rinda:

Thank you for your interest in Xerxes Corporation / Heil Process Equipment engineering services and in our line of corrosion resistant equipment. Both #5 and #6 pickle line fume scrubbers were tested on September 29, 1997.

Data collected during testing included airflow, once-through liquid flow rate, inlet hydrochloric acid concentration, and outlet hydrochloric acid concentration. The average hydrochloric acid removal efficiency for #5 pickle line scrubber was 90% and the average hydrochloric acid removal efficiency for #6 pickle line scrubber was 80%. During our discussion following testing, it was noted that the new sieve trays had not been installed on #6 pickle line scrubber which may explain the dramatic reduction in efficiency. I recommended the upgrade to high density polypropylene or polyethylene to help prevent or reduce tray warping. Additionally, the volumetric airflows on both systems were slightly lower than the design capacity which would warrant an inspection of the fan impellers during the next shut down. Finally, a significant amount of moisture was noted at the discharge of both systems which would be a result of worn or damaged mist eliminators. I recommend upgrading to the 4-Bend style, if space permits, as opposed to the 2-Bend style. This will slightly increase pressure drop but will enhance mist removal.

If you have any questions or require further assistance, please do not hesitate to contact our sales office directly.

Best Regards,
Xerxes Corporation
Matt Biesterveld
Matt Biesterveld, E.I.T.
Applications Engineer

WCI Steel

#5 and #6 Pickle Line Fume Scrubber Testing

Performed By: Matt Biesterveld, Xerxes Corporation

Date: 9/29/97

Summary of Test Data - #5 Pickle Line Fume Scrubber

Sample	VP ("w.c.)	Airflow (CFM)	Water Rate (GPM)	Inlet HCl (PPM)	Outlet HCl (PPM)	Efficiency (%)
1	0.37	23,063	10.25	150	14	91
2	0.37	23,250	10.25	125	14	89
3	0.39	23,600	10.25	135	16	88
4	0.38	23,425	10.25	200	20	90
Ave.	0.38	23,335	10.25	153	16	90

Summary of Test Data - #6 Pickle Line Fume Scrubber

Sample	VP ("w.c.)	Airflow (CFM)	Water Rate (GPM)	Inlet HCl (PPM)	Outlet HCl (PPM)	Efficiency (%)
1	0.47	28,961	10.75	200	40	80
2	0.59	29,234	10.75	175	40	77
3	0.55	28,157	10.75	175	32	82
4	0.57	28,716	10.5	160	34	79
Ave.	0.55	28,767	10.69	178	36	80

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: WARREN CONSOLIDATED INDUSTRIES INC. Date of Inspection: 25 MAY 89
 Address: 1040 Pine Ave. SE HWFB #: 02-78-0184
WARREN, OH 44483-6528 USEPA ID #: OH000-409-521
 County: TRUMBULL Facility Phone #: (216) 841-8000
 Facility Contact: THOMAS D. SHEPHERD Facility Contact Phone #: (216) 841-8200
DAVID CALDERWOOD Safety Equipment #: _____
 Inspector(s) Name(s): KRIS L. CODER

STATUS

Cond. Ex. SQG _____ SQG _____ Generator X Transporter _____ Treatment _____ Storage X Disposal X

ACTIVITIES

Containers _____ Tanks X Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile X Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- | | | Y/N/NA | REMARK # |
|----|--|------------|---------------|
| 1. | Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>Y</u> | _____ |
| 2. | Are they : | | |
| a. | Abandoned(disposed; incinerated; accumulated, stored, or treated prior to disposal)? | <u>Y</u> | <u>STORED</u> |
| b. | Recycled? | <u>N</u> | _____ |
| c. | Inherently waste-like?(F020, F021, F022, F023, F026, F028)? | <u>N</u> | _____ |
| 3. | If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. | Used in a manner constituting disposal? | <u>N/A</u> | _____ |
| b. | Burned for energy recovery? | <u>I</u> | _____ |
| c. | Reclaimed? (Refer to Table 1 of 3745-51-02) | <u>I</u> | _____ |
| d. | Accumulated speculatively? | <u>I</u> | _____ |
| 4. | Is the material recycled by being: | | |
| a. | Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>N/A</u> | _____ |
| b. | Used as an effective substitute for commercial products? | <u>I</u> | _____ |
| c. | Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>I</u> | _____ |

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	<u>SEE ATTACHED</u>
6.	Has the facility submitted a Part A to Ohio?	<u>Y</u>	<u> </u>
7.	If yes, is it complete and accurate?	<u>Y</u>	<u> </u>
8.	If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	<u>N</u>	<u> </u>
9.	Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>Y</u>	<u> </u>
10.	Has the facility submitted a Part B?	<u>Y</u>	<u> </u>
11.	Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>1 WEEK</u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

FACILITY HAS WASTE PICKLE LIQUOR (HCL) STORAGE UNITS ON-SITE. NEW TANK UNITS AT THE GALVANIZED PICKLE LIQUOR LINE, 5 + 6 PICKLE LINES AND ACID REGENERATION PLANT. ALL TANKS ARE SECONDARILY CONTAINED. REGENERATION PLANT RECEIVES HCL FROM 5 + 6 PICKLERS AND FROM OFF-SITE FROM CLEVELAND LTU. SHIPS OFF-SITE HCL PICKLE LIQUOR AND TANK SLUDGES WHICH CANNOT BE REGENERATED TO MILL SERVICES IN PA. AND BY-PRODUCTS IN CLEVELAND. ALSO, GENERATES AND SHIPS OFF-SITE NANTHA (D001) TO SAFETY-KLEEN. FACILITY HAS RETAINED AN UN-CLOSED COAL PILE (WASTE-PILE) WHICH STORED + DISPOSED K087, HAS NOT GENERATED ANY CILS CONTAMINATED WITH CHLORINATED COMPOUNDS SINCE THE LAST INSPECTION. FACILITY HAS OTHER NON-HAZARDOUS WASTE STREAMS INCLUDING GALVANIZED BAGHOUSE DUST FROM THE GALVANIZING LINE (WHICH IS DISPOSED OFF-SITE); BOILER HOUSE BAGHOUSE: DISPOSED OFF-SITE TO BFI; THE ON-SITE LANDFILL RECEIVES BOF PRECIPITATOR DUST, AND WASTEWATER TREATMENT SLUDGE AND BOF FLIGHT CONVEYOR SLUDGE.

QAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

- | | | | |
|----|--|----------|--|
| 1. | Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)? | <u>Y</u> | |
| 2. | Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)? | <u>N</u> | |
| 3. | Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))? | <u>Y</u> | |
| 4. | Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG?
If so, complete appropriate checklist. | <u>N</u> | |
| 5. | Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest: | | |
| a. | All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22? | <u>Y</u> | |
| b. | The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)? | <u>Y</u> | |
| c. | The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)? | <u>Y</u> | |
| d. | Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)? | <u>Y</u> | |
| e. | The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? | <u>Y</u> | |
| f. | Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)? | <u>Y</u> | |

		<u>Y/N/NA</u>	<u>REMARK #</u>
6.	Does the generator meet the following hazardous waste pre-transport requirements:	<u>Y</u>	_____
a.	Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	<u>Y</u>	_____
b.	Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	<u>N/A</u>	_____
c.	Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	<u>Y</u>	_____
7.	Does the generator import or export hazardous waste?	<u>N</u>	_____
	If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	<u>N/A</u>	_____
8.	If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a.	The containers or tanks are clearly marked with the words "Hazardous Waste"?	<u>N/A</u>	<u>HAS PERMIT</u>
b.	The date that accumulation began is clearly marked on each container?	<u>+</u>	<u>FOR STORAGE</u>
c.	If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist.	<u>+</u>	_____

		Y/N/NA	REMARK #
d.	If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete <u>Storage and Treatment in Tanks</u> checklist.	<u>Y</u>	<u>SEE TANK</u>
e.	If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		<u>INSPECTION</u>
	1. Quantities of waste accumulated do not exceed 55 gallons at any time?	<u>N/A</u>	
	2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?		
	3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77?		
	4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?		
9.	Has the generator accumulated hazardous wastes in excess of ninety (90) days?	<u>N</u>	<u>EVEN THOUGH</u>
10.	Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?		<u>PERMITTED</u>
		<u>N/A</u>	<u>TANKS ARE</u>
			<u>EMPTIED COMPLETELY EVERY 90 DAYS</u>
11.	Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	<u>N</u>	

Y/N/NA REMARK #

12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.

NEED TO PROVIDE
DOCUMENTATION
OF ALL TRAINING
INCLUDING
SUPERVISORS
ABSENT DURING
TRAINING SESSIONS
IN GALVANIZED
TERRACE
AND DOCUMENTED
TRAINING
OF EMPLOYEES
OF REBEL FURNACE
INCLUDING SUPERVISOR
JOHN REED,
Y

REMARKS, GENERATOR REQUIREMENTS

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u>Y</u>	<u>REV. NOV. 88</u>
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	<u>Y</u>	<u>REV. NOV. 88</u>
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>Y</u>	<u> </u>
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u>Y</u>	<u> </u>
IF BOTH 3A and 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.			
4.	Does the facility have -	<u>Y</u>	<u> </u>
	a. A 24-hour surveillance system, or		
	b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	<u>Y</u>	<u> </u>
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)](265.14(c))	<u>Y</u>	<u> </u>
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>Y</u>	<u> </u>

		Y/N/NA	REMARK #
b.	Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] (265.15(b)(4))	Y	
7.	Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (265.16(a)(b)(c))	Y	
8.	Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records. (265.16(d)(e))	N	SEE PREVIOUS COMMENTS IN GENERAL SECTION
9.	If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17](265.17)	N/A	IGNITABLE WASTE NOT STORED
a.	Protection from sources of ignition.		
b.	Physical separation of incompatible waste materials.		
c.	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.		
d.	Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))		

OF 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	_____
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	<u>Y</u>	_____ <i>SPE. PICKLE LIQUOR, INTO SECONDARY CONTAINMENT, REPORTED AS REQUIRED</i>
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)	<u>Y</u>	_____
a.	Internal alarm system?	<u>Y</u>	_____
b.	Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	_____
c.	Portable fire control equipment?	<u>Y</u>	_____
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	_____
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	_____
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	_____
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>Y</u>	_____
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	_____

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

N/A All EMER-
GENZY AUTHORITIES
HAVE
INDICATED THEY
WILL RESPOND
AND THESE ARE
PART OF THE
OPERATING
RECORD

Q/ 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? Y _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.51(f))? Y _____
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) Y _____
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) Y _____
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y _____
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) N/A _____

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
 - c. The estimated (or actual) weight, volume or density of the waste material?
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73(B)(2) (Part 265, Appendix I, Table 2)
 - e. The present physical location of each hazardous waste within the facility?
 - f. Records of incidents which require implementation of the Contingency Plan?
 - g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))
 - h. Records of any waste analyses and trial tests required to be performed?
 - i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?
 - j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>N/A</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>Y</u>	_____
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	<u>Y</u>	_____
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	<u>Y</u> <u>Y</u>	_____ _____
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	<u>N/A</u>	_____
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	<u>N/A</u>	_____
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	<u>Y</u>	_____
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u>N/A</u>	_____

C. 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		Y/N/NA	REMARK #
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	<u>Y*</u>	THE MAY 6, 1981 PLAN HAS BEEN REVISED HERE. THE LATEST REVISION IS MAY 1985 SUBMITTED AS PART OF FACILITY'S PART B.
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.11.	_____	_____
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).	_____	_____
c.	An estimate of the maximum amount of hazardous waste in inventory.	_____	_____
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	_____	_____
e.	The year closure is expected to begin and a schedule for the various phases of closure.	_____	_____
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	_____	_____
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which effects the closure plan? [3745-66-12(C)] (265.112(c))	_____	_____
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process or 45 days if only have tanks, container storage or incinerator? [3745-66-12(D)] (265.112(d))	_____	_____
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D) (265.112(d))	_____	_____

* A THOROUGH REVIEW OF THIS PLAN WAS NOT CONDUCTED AS PART OF THIS INSPECTION BUT WILL BE DONE AS PART OF THE TECHNICAL REVIEW FOR THE PART B. CLOSURE OF THE WASTE PILE (WAL PILE) IS UNDER THE E.P.R.

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	_____	_____
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	_____	_____
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	_____	_____
8.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	_____	_____
9.	If closure was partial, list the regulated units which remain in use at the facility: _____ _____		
10.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	_____	_____
11.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	_____	_____
	b. A description of planned maintenance activities?	_____	_____
	c. The name, address and phone number of person/office to contact during the post-closure period?	_____	_____
12.	For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	_____	_____

Y/N/NA REMARK #

13.~96Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
- b. Land use is restricted pursuant to 3745-66-17?
 [3745-66-10] (265.119)

Q 3745-67 TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L) X

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251)	<u>N</u>	
2.	If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)		
a.	(1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and	<u>N</u>	
	(2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	<u>N</u>	
	(3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	<u>N</u>	
	(4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; <u>or</u>	<u>N</u>	
b.	(1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	<u>N</u>	
	(2) No liquids or wastes containing free liquids are placed in the pile.	<u>N/A</u>	
3.	No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252)	<u>N/A</u>	

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X SEE PREVIOUS COMMENT CONCERNING CLOSURE OF WASTE PILE (WAL PILE).

C.C. 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat hazardous wastes containing no free liquids and that are inside a building with an impermeable floor, the Paint Filter Liquid Test must be used to confirm the absence or presence of liquids in the waste and tanks and sumps used as part of a secondary containment system are exempt from 3745-66-93 (265.193).

For generator who store wastes in tanks for less than 90 days use items 1-5, 18 and 22-25. Except that compliance with with 3745-66-97(C) (265.197) is not required.

Y/N/NA REMARK #

1. For existing tank systems without secondary containment that meets 3745-66-93 (265.193) standards, does the owner/operator (o/o) have a written assessment on file at the facility that meets all of the following requirement? [3745-66-91(A)(B)] (265.191(a)(b))

N/A _____

- a. It is certified by an independent Professional Engineer (P.E.).
- b. Design standards have been considered.
- c. The characteristics of hazardous waste(s) that have been or will be handled have been considered.
- d. Corrosion protection measures have been considered.
- e. The age of the tank system has been estimated or documented.
- f. A leak test for non-enterable underground tanks has been conducted.
- g. A leak test or an internal inspection by qualified P.E. has been conducted for other than non-enterable underground tanks.

2. For tanks used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))

N/A _____

Y/N/NA REMARK #

3. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 [3745-66-91(D)] (265.191(d))
4. For new tank systems, has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following? [3745-66-92(A)] (265.192(a))
 - a. Design standards
 - b. The characteristics of hazardous waste to be stored or treated
 - c. Corrosion protection
 - d. Protection from vehicular traffic
 - e. Adequacy of tank foundation, proper anchoring and effects of front leave.
5. Does the o/o have on file at the facility, written statements, by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:
 - a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))
 - b. Proper backfilling; [3745-66-92(C)] (265.192(c))
 - c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))
 - d. Proper support and protection of auxiliary equipment; [3745-66-92(E)] (265.192(e))
 - e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))

N/A _____

Y _____
Y _____
Y _____
Y _____
Y _____

Y _____
N/A _____
Y _____
Y _____
Y _____

Y/N/NA REMARK #

6. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Director) (Administrator). If yes, skip items 7 through 11.
7. Has the o/o installed secondary containment which meets the requirements of 3745-65-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)
- a. For all new tank systems prior to being put into service
 - b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.
 - c. For existing tank system of known and documentable age, the later of January 12, 1989, or when the tank reaches 15 years of age.
 - d. For existing tank systems of undocumentable age, by January 12, 1995 unless the facility is greater than seven years old before the facility is fifteen years old.
 - e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989.
8. Was the secondary containment system(s) at the facility designed, installed and is operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids. [3745-66-93(B)] (265.193(b))

N/A _____

N/A _____

Y _____

Y/N/NA REMARK #

9. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C)] (265.193(c)):

- a. It is constructed or lined with compatible materials with sufficient strength to prevent failure.
- b. It is placed on a foundation or base capable of providing support.
- c. A leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours or at earliest practicable time is provided.
- d. It is sloped or designed to drain and remove liquid, liquid (including accumulated precipitation) is removed within 24 hours or in a timely manner.

Y _____
Y _____
Y VISUAL
Y INSPECTION

10. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator?

Y _____

a. External Liner

1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank?
2. Is the external liner designed and operated to prevent run-off and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
3. Is the external liner free of cracks and gaps?
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?

Y REGEN PLANT
Y TANK FARM
Y ONLY
Y _____
Y _____
Y _____

Y/N/NA REMARK #

b. Vault System

1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
3. Are chemically resistant water stops in place at all joints?
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?
6. Is the vault system provided with an exterior moisture barrier?

<u>Y</u>	_____
<u>Y</u>	_____
<u>Y</u>	_____
<u>Y</u>	ACTU BRICK
<u>N/A</u>	LINED. TANK FROM AT AFD
<u>N/A</u>	REGEN HAS ORGANIC COATING.

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

<u>N/A</u>	_____
<u>Y</u>	_____
<u>Y</u>	_____

11. Is ancillary equipment provided secondary containment and inspection daily (except above ground piping)?

<u>N</u>	NEED DAILY INSPECTION DOCUMENTED. REUSE INSP. LOG.
----------	---

Y/N/NA REMARK #

12. For tank systems for which secondary containment is not yet provided, does the o/o have on file at the facility a record of the following:
- a. For non-enterable underground tanks, a leak test conducted at least annually.
 - b. For all other tanks, an annual leak test or internal inspection by an independent P.E., and
 - c. For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))
13. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed?
14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (a)(b)(c) and (d) and 3745-66-93(G)(4)(b) and (c) and (265.193(g)(4)(b) and (c)?
15. Has the o/o complied with the following for all tank systems until secondary containment is provided? [3745-66-93(I)] (265.193(i))
- a. Non-enterable underground tanks have had an annual leak test?
 - b. All other tanks have had an annual leak test or an internal inspection?

N/A

N/A

N/A

N/A

N/A

		Y/N/NA	REMARK #
16.	Does the o/o have on file at the facility a results of the assessments in No. 15? [3745-66-93(I)(3)] (265.93(i)(3))	<u>N/A</u>	_____
17.	For tanks found to be leaking as a result of assessment in 3745-66-93(I)(1) through (3) (265 (i)(1) through (i)(3)), has the o/o complied with 3745-66-96 (265.196); [3745-66-93(I)(4)] (265.93(i)(4))	<u>N/A</u>	_____
18.	Does the o/o follow the <u>general operating requirements</u> below: [3745-66-94] (265.94)		
	a. Hazardous waste treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.	<u>N/A</u>	_____
	b. The o/o uses appropriate controls to prevent spills or overflows from the system.	<u>Y</u>	_____
	c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	<u>Y</u>	<u>REPORTED</u> + <u>MADE</u> <u>CORRECTION</u>
19.	Has the o/o documented the inspection required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
	a. Spill control equipment (daily).	<u>N</u>	<u>NEEDS</u> <u>TO DOCUMENT</u>
	b. Above ground portion of the tank (daily).	<u>N</u>	<u>THESE INSP.</u>
	c. Data from leak detection equipment (daily).	<u>N/A</u>	<u>DAILY +</u>
	d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	<u>N</u>	<u>REUSE</u> <u>INSPECTION</u> <u>LOG:</u>
	e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	<u>N/A</u>	_____
	f. All sources of impressed current at least bi-monthly.	<u>N/A</u>	_____

Y/N/NA REMARK #

20. Response to leaks or spills and disposition of leaking or unfit for use tanks. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

- a. Immediately ceased flow into tank and investigated cause of release
- b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.
- c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.
- d. Immediately conducted a visual inspection of the release and prevented further migration and removed and disposed of any visible contamination of soil or surface water.
- e. Reported any release to the environment to the Director (Regional Administrator) within 24 hours unless it is less than 1 lb. and was cleaned up immediately.
- f. Submitted a report within 30 days of the release to Director (Regional Administrator).

<u>N/A</u>	<u>NO TANKS</u>
<u>Y</u>	<u>HAVE BEEN REMOVED</u>
<u>Y</u>	<u>TIMELY AS POSSIBLE</u>
<u>Y</u>	<u>_____</u>
<u>Y</u>	<u>_____</u>
<u>Y</u>	<u>_____</u>

21. Has the o/o closed the tank system or have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))

- a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.
- b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.
- c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.

<u>N/A</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>

Y/N/NA REMARK #

- d. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel). N/A _____
22. Has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)? N/A _____
23. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))
- a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or N/A _____
- b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or I _____
- c. The tank is used solely for emergencies. I _____
24. If ignitable or reactive waste is stored or treated is it stored or treated in compliance with the NFPA flammable and combustible code (1971 or 1981)? [3745-65-17(B) (265.17(b)) is complied with? N/A _____
25. Has the o/o not placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material unless 3745-65-17(B) (265.17(b)) is complied with? [3745-66-99] (265.199) N/A _____
26. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-99] (265.200)
- a. Conducted waste analysis and trial treatment storage tests. N/A _____
- b. Obtained written documentation or similar waste under similar operating conditions. I _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: WARREN CONSOLIDATED INDUSTRIES, INC.
 U.S. EPA I.D. No.: OH 060-409-521
 Street: 1040 PINE AVE. S.E.
 City: WARREN State: OH Zip Code: 44483-6528
 Telephone: (216) 841-8200
 Operator: SAME AS ABOVE

Street: _____
 City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: SAME AS ABOVE

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 2 JUL 89 Time: 8:30 Weather Conditions: FAIR

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>KRIS L. CODER</u>	<u>DEPA</u>	<u>(216) 425-9171</u>

Facility Representatives: _____

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	_____	_____	<u>X</u>	<u>X</u>
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	_____	<u>X</u>	<u>X</u>
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>	N/A				
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	_____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen. Treat Store Disp. Trans. *N/A*

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

X X

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to *N/A*

50 ppm

500 ppm

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

 Yes No NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) *N/A*

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006°	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001°	_____	_____	_____	_____	_____
K004°	_____	_____	_____	_____	_____
K008°	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015°	_____	_____	_____	_____	_____
K016°	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018°	_____	_____	_____	_____	_____
K019°	_____	_____	_____	_____	_____
K020°	_____	_____	_____	_____	_____
K021°	_____	_____	_____	_____	_____
K022°	_____	_____	_____	_____	_____
K024°	_____	_____	_____	_____	_____
K025°	_____	_____	_____	_____	_____
K030°	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036°	_____	_____	_____	_____	_____
K037°	_____	_____	_____	_____	_____
K044°	_____	_____	_____	_____	_____
K045°	_____	_____	_____	_____	_____
K046°	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____X_____	_____	_____X_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION
GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☐ Yes ☐ No ☒ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

1 Yes No NA

If yes, check the appropriate treatability group.

 Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
✓ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>K062</u>	<u> </u>	<u>✓</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

B. Waste Analysis

1. F-Solvent Wastes

N/A

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

 Yes No NA

How was this determination made?

- Knowledge of waste

 Yes No

If yes, is any supporting data available for review? Describe how this is adequate.

- TCLP

 Yes No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes ☒ No _____ NA (IT IS A LIQUID)

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes ☒ No _____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☒ Yes _____ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate. SEMI ANNUAL WASTESTREAM ANALYSIS

- Testing ☒ Yes ☐ No ☐ NA

If yes, list test method used: E.P. RICE, PH - 5150 - NU

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes ☐ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: K062

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. SEMI ANNUAL WASTESTREAM ANALYSIS

- TCLP

☒ Yes ☐ No ☐ NA

LATEST ANALYSES
WILL INCLUDE
TCLP - RESULTS
ARE PENDING.

- Total Constituent Analysis

☒ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

FREQUENCY OF TEST SEMI-ANNUAL, SAMPLED
DECEMBER 31, 1988 (E.P. TOXIC.) APRIL 17th SAMPLE
FOR TCLP IS PENDING.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

d. How does the generator test the waste when a process or waste stream changes?

SEND OUT FOR ANALYSIS. ANALYSIS IS
DONE ROUTINELY SEMI-ANNUAL. IF A WASTESTREAM
CHANGES OR IS THOUGHT TO CHANGE ANALYSIS
IS DONE REGARDLESS

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

- c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No
 Applicable treatment standards ☒ Yes ☐ No
 Manifest number ☒ Yes ☐ No
 Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: WELL SERVICES, SHIPMENTS
BY PRODUCTS MANAGEMENT

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? *N/A*

☐ Yes ☐ No

- f. Does notification contain the following? *N/A*

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☒ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No *N/A*

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	_____ Yes	_____ No	<i>N/A</i>
The corresponding treatment standards and all applicable prohibitions	_____ Yes	_____ No	
Manifest number	_____ Yes	_____ No	
Waste analysis data, if available	_____ Yes	_____ No	
Date the waste is subject to the prohibitions	_____ Yes	_____ No	

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

_____ Yes _____ No *N/A*

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

_____ Yes _____ No *N/A*

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? _____ Yes _____ No

Addresses _____ Yes _____ No

Telephone Numbers _____ Yes _____ No

Contact dates _____ Yes _____ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

_____ Yes _____ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

N/A

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS *N/A*

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☐ No ☒ NA
 o California List ☒ Yes ☐ No ☐ NA
 o First Third ☒ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? NOV. 88

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: NUS, KEYSTONE

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☒ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☒ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling: SEMI ANNUAL

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☐ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☐ No ☒ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☐ Yes ☐ No ☒ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☒ Yes ☐ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes ☒ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes _____ No _____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments? N/A

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

N/A

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal *N/A*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

19 MAY 87 9:30 A.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IIWFAB # 02-78-0184

U.S. EPA I.D. # OH D 060-409-521

GENERAL INFORMATION

Facility: LTV STEEL COMPANY Address: 1050 PINE ST. S.E. City: WARREN
State: OH Zip Code: 44481 County: TRUMBULL Telephone: (216) 841-8200

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>ROBERT J. LANNON</u>	<u>MGR. ENVIRONMENTAL CONTROL</u>	<u>(216) 841-8200</u>
2. <u>DAVE CALDERWOOD</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 841-8201</u>
3. <u>JOHN M. POTWORA</u>	<u>ENVIRONMENTAL MANAGEMENT ENGINEER</u>	<u>(216) 429-6536</u>

INSPECTOR(S)

1. <u>KRIS CODER</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>(216) 425-9171</u>
2. _____	_____	_____
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☐ Generator only (G)
☐ Transporter (T)
☐ TSDF only
☐ G-T
☐ G-TSDF
☐ T-TSDF
☒ G-T-TSDF

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
☒ Containers S01
☒ Tanks S02/T01
☐ Surface Impoundments S04/T02
☐ Incineration/Thermal Treatment

- ☒ Waste Piles S03
☐ Land Treatment D01
☐ Landfills D00
☐ Chemical/Physical/Biological 104
☐ Groundwater Monitoring
☒ Post-Closure
LAND DISPOSAL RESTRICTION

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

Yes No N/A Remark #

✓ — —

2. If "yes", is it complete and accurate?

— ✓ —

SUBMITTED WITH
CHANGE IN NAME

3. Has the facility submitted a Part B?

— ✓ —

4. Was advance notice of the inspection given? If so, how far in advance?

✓ — —

3 WEEKS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	RECYCLE OF COAL TAIL SLUDGE SLUDGE TO AKS PROCESS
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CURRENTLY USED MOST UP TO DATE MANIFEST
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 263 (DAC 3745-53) TRANSPORTER REQUIREMENTS

REGISTERED WITH USE
NOT PUCO - DOES NOT
TRANSPORT.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]	—	—	—	—
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]	—	—	—	—
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].	—	—	—	—
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].	—	—	—	—
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].	—	—	—	—
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].	—	—	—	—
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c)) [3745-53-22(D)].	—	—	—	—
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	—	—	—	—
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(c)] made?	—	—	—	—
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?	—	—	—	—
9. Does the transporter store hazardous waste temporarily while they are in transit?	—	—	—	—
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]	—	—	—	—
<u>NOTE:</u> TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.				
10. Does the transporter import hazardous waste into the United States?	—	—	—	—
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	—	—	—	—
<u>NOTE:</u> A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(c)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].				

REMARKS, TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

Yes No N/A Remark #

UP-DATE ANALY-
ON #'S 5 + 6
PICKERS AND
COMB. AIR SENS

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

Yes No N/A Remark #

INCLUDE TRNG
OF ANALYSIS TO
ENRIT WASTE
STREAM

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

Yes No N/A Remark #

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

Yes No N/A Remark #

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

Yes No N/A Remark #

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

Yes No N/A Remark #

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

Yes No N/A Remark #

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ADDED NEW H.W. TRAINING FORMAT IN ADDITION TO REGULAR D.V.
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ☒ —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. ☒ —
 - b) Access to telephone, radio or other device for summoning emergency assistance. ☒ —
 - c) Portable fire control equipment. ☒ —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ☒ —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ☒ —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ☒ —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] ☒ —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ☒ —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — ☒ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓
 - b) Arrangements or agreements with local or state emergency authorities. ✓
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

✓			
✓			
✓			
✓			
✓			
		✓	
✓			
✓			
		✓	
✓			

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>NOTE:</u> THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure*

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]
 - a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]
 - b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.
 - c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)
 - d) A description of steps taken to decontaminate facility equipment.
 - e) The year closure is expected to begin and a schedule for the various phases of closure.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]

PROCEEDING REVIEW
AND COMMENT PERTAIN
TO ONLY THE "CLOSURE
PLAN FOR SPENT PICKLING
LIQUOR AND DECANTER
TANK TAR SLUDGE STR
FACILITIES (SEPT. 1986)

✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
✓	_____	_____	_____
_____	_____	✓	_____
_____	_____	✓	_____

* SEPTEMBER 1986 CLOSURE PLAN SUBMITTED TO COMPLY WITH 40 CFR 265 SUBPART 6 AND OAC 3745-66. PLAN ADDRESSES CLOSURE OF GALVANIZING LINE TANK, MAIN PICKLING LINE TANK, ACID REGENERATION STORAGE TANKS, AND DECANTER TANK TAR SLUDGE CONTAINERS. THIS PLAN, HOWEVER, DOES NOT ADDRESS RCRA CLOSURE OF THE WASTE PILE STORAGE AREA (COAL PILE) WHICH IS BEING ADDRESSED THROUGH APPEAL TO THE ENVIRONMENTAL BOARD OF REVIEW (EBR).

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart H: Financial Requirements * *

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
✓	—	—	\$228,700 *
✓	—	—	1986 Estimate
—	—	—	—
—	—	—	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

* COST ESTIMATE DOES NOT INCLUDE CLOSURE COST, POST-CLOSURE COST FOR CLOSURE OF WASTE PILE. COST ESTIMATE IS REFLECTED IN "CLOSURE PLAN FOR SPENT PICKLE LIQUOR AND DECANter TANK TAR SLUDGE STORAGE FACILITIES" SEPT. 1986.

* * FACILITY CURRENTLY UNABLE TO OBTAIN LIABILITY COVERAGE AS PART OF FINANCIAL REQUIREMENTS. ON MAY 15, 1987, DIRECTOR OF DEPA ISSUED ORDERS TO THE FACILITY TO DOCUMENT COMPLIANCE WITH GAC 3745-66-47 WITHIN 150 DAYS FROM THE EFFECTIVE DATE OF THE FTO'S.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

—	—	✓	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].			✓	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.			✓	
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]			✓	
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			✓	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart L: Storage in Waste Piles

1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. (265.251) [3745-67-51]
2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: (265.253) [N/A]
 - a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.
 - b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. (265.252) [3745-67-52]
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (265.256) [3745-67-56]
 - a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 265.17(b). [3745-65-17]
 - b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.

Yes	No	N/A	Remark #
—	✓		CURRENTLY, WASTE PILE CLOSURE IS BEING APPROVED THROUGH THE EBR, ENVIRONMENTAL BOARD OF REVIEW. NO LONGER IS COAL PILE BEING ACTIVELY USED FOR COAL TAR DECANIER STORAGE AND DISPOSAL.
—	—	✓	
—	—	✓	

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.256 and 265.257(a)) [3745-67-56 and 3745-67-57(A)] | ___ | ___ | <u>✓</u> | ___ |
| 6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (265.257(b)) [3745-67-57(B)] | ___ | ___ | <u>✓</u> | ___ |

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. 060409521

WARREN

Facility: REPUBLIC STEEL MAH. VALLEY Address: 1040 PINE AVE City: WARREN

State: OHIO Zip Code: 44481 County: TRUMBULL Telephone: 216-841-8200

Facility Operator: REPUBLIC STEEL (THOMAS KACHUR) Title: MGR. ENV. CONTROL Telephone: 216-841-8200

Facility Owner: REPUBLIC STEEL CORPORATION Address: P.O. BOX 6778

City: CLEVELAND State: OHIO Zip Code: 44101 Telephone: 216-622-5000

Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-78-0184

Date of Inspection: 6/17/82 Time of Inspection: (Start) 9:04 (Finish) _____

Advance Notification? ☐ No ☒ Yes: _____

Weather Conditions: CLOUDY 70'S

INSPECTION PARTICIPANT(S)

(Name)

(Title)

(Telephone)

1. TOM KACHUR

MGR. ENV. CONTROL

216-841-8200

2. ED BROESTL

ENV. ENGINEER

216-622-5096

3. JEFF SUDIMACK

ENV. ENGINEER

216-841-8201

4. _____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	DAVID N. WERTZ	ENVIRONMENTAL SCIENTIST	216-425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment
D. ☒ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: K062, K087

b) Non-Listed Wastes: ☒ I ☐ C ☐ R ☐ T
D001 D002 D003 D000

D001 - Bag House Dust

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) _____ No See Comment #1

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Steel Plant including Coke Battery, blast furnaces,
and mills producing flat roll coils and sheets,
galvanize and Tenne coated steel, and silicone
grade steel.

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	✓	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	✓	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	✓	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	✓	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	✓	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	<u>JSA's</u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	<u>JSA's</u>

RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#1
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	_____	_____	✓ _____	_____
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	_____	_____	✓ _____	_____
9. Does the transporter store hazardous wastes temporarily while they are in transit?	_____	_____	✓ _____	_____
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	_____	_____	✓ _____	_____

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	_____	_____	✓ _____	_____
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	_____	_____	✓ _____	_____

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

D: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
I: Preparedness and Prevention	F: Ground Water Monitoring	
J: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Inspect monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Inspect security, alarm and communications devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Inspect process equipment (pipes, pumps, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Inspect containment structures (dikes, curbs, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Inspect hazardous waste handling/loading areas each day used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Record of any malfunctions due to equipment or operator errors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Record of any hazardous waste discharges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>#2</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>#2</u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35). | <u>—</u> | <u>—</u> | <u>✓</u> | <u>—</u> |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <u>✓</u> | <u>—</u> | <u>—</u> | <u>#3</u> |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B). | <u>—</u> | <u>—</u> | <u>✓</u> | <u>—</u> |

Subpart D: Contingency and Emergency

- | | | | | |
|--|----------|----------|----------|-----------|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components: | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| a) Actions to be taken by personnel in the event of an emergency incident. | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| b) Arrangements or agreements with local or state emergency authorities. | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F). | <u>—</u> | <u>—</u> | <u>✓</u> | <u>#4</u> |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <u>—</u> | <u>✓</u> | <u>—</u> | <u>#5</u> |

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- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|----------------------------------|
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. An emergency coordinator is designated at all times, (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Never had to implement the plan. |

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|--------------------------|-----------------|
| 1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | #6 |
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) The estimated (or actual) weight, volume or density of the waste material(s). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable; the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>✓</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	<u>✓</u>	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>✓</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>✓</u>	_____

Subpart F: Groundwater Monitoring

N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	_____	_____

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	<u> </u>	<u> </u>	<u>No plans to close at this time</u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—

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- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|-------------------------------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | | | <input checked="" type="checkbox"/> | |

Subpart H: Financial Requirements

- | | | | | |
|--|-------------------------------------|--|--|--|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | <input checked="" type="checkbox"/> | | | |
|--|-------------------------------------|--|--|--|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|--------------------------|---------------------------------|
| 1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <i>dumpster type containers</i> |
| 2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	<u>✓</u>	—	—	—
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-56-17-B.	<u>✓</u>	—	—	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<u>✓</u>	—	—	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	—	—	<u>✓</u>	—
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	<u>✓</u>	—	—	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	<u>✓</u>	—	—	—

Subpart K: Surface Impoundments N/A

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	—	—	—	—
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	—	—	—	—

ISS INSPECTION COMMENTS
REPUBLIC STEEL - MAHONING VALLEY WARREN
JUNE 17, 1982

- #1. The company has not transported hazardous wastes yet, and will register with PUCO prior to doing so.
- #2. Job Safety Analysis Procedures (JSA's) are used for the Personnel Training and records and appear to meet the intent of the regulations,
- #3. The facility has it's own hospital and feels it can handle emergencies associated with the hazardous wastes. The company also has it's own fire brigades.
- #4. The facilities are all outdoors and would not necessitate evacuation.
- #5. The company feels the hazards involved with the materials (pickle liquor and decanter tank tar sludge) would not necessitate the involvement of the local fire departments.
- #6. There is continous production and hauling of bag house dust and pickle liquor, which are mixed together and hauled daily. The manifest act as records.

RCRA Inspection Report

EPA Identification Number OHD 060409521

HWFAB Permit Number (if appropriate) 02-78-0184

Facility Name Republic Steel Mahoning Valley Warren

Location 1040 Pine Avenue 44481

Warren, Ohio

Person(s) Interviewed

Title

Telephone

Tom Kachur
Ed Broestl
Jeff Sudimack

MGR. ENV. CONTROL
ENV. Engineer
ENV. Engineer

216-841-8200
216-622-5096
216-841-8201

Inspector(s)

Agency/Title

Telephone

DAVID N. WERTZ

Ohio EPA Environmental
Scientist

216-425-9171

Ohio EPA

Ohio EPA

Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☐ Financial Requirements
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☒ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0184
OWNER - Republic Steel
FACILITY NAME - Mahoning Valley Warren
FACILITY LOCATION - 1040 Pine Ave, Warren, Ohio 44481
FACILITY CONTACT - Tom Kuchur
ISS INSPECTION DATE - 7/29/81

PHONE NO. - (216) 841-8200

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13	B	✓	
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OOPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53		✓	
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"			
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142			
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173		✓	
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
13	M	7	3745-57-37	265.257		
		1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
15	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
			2	"	"	
			3	"	"	
			4	"	"	
	G	1	3745-57-85	265.315		
16	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
	II	A	5	"	"	
			1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
			2a	3745-58-35	265.375	
			b	"	"	
			1	"	"	
17	B	2	"	"		
		3	"	"		
		4	"	"		
		5	"	"		

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEP/ Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	(C) 8	3745-52-42	262.42			
	2 (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

STATE IDENTIFICATION NUMBER

87-HW- 0134

EPA IDENTIFICATION NUMBER

CHD 060409521

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: REPUBLIC STEEL MAHONING VALLEY WARREN
(B) Street: 1040 PINE AVE.
(C) City: WARREN (D) State: OH (E) Zip Code: 44181
(F) Phone: 216-841-8200 (G) County: TROMBULL
(H) Operator: SAME
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: REPUBLIC STEEL CORP.
(P) Street: P.O. BOX 6778
(Q) City: CLEVELAND (R) State: OH (S) Zip Code: 44101
(T) Phone: 216-622-5000 (U) County: CUYAHOGA
(V) Date of Inspection: 7-29-81 (W) Time of Inspection (From) 9:00 A (To) 11:30 A
(X) Weather Conditions: 75°F LIGHT RAIN

(Y)	Person(s) Interviewed	Title	Telephone
	<u>TOM KACHUR</u>	<u>MGR. ENV. CONTR.</u>	<u>216-841-9200</u>
	<u>DAVE GUBANC</u>	<u>SOLID WASTE MGMT ENGR</u>	<u>216-622-5911</u>
	<u>DALE PAPAJCIC</u>	<u>"</u>	<u>216-622-5911</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>WM SKOWRONSKI</u>	<u>DISTRICT ENGINEER</u>	<u>216-425-9171</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><u> </u> A. Storage and/or Treatment</p> <p> 1. Containers (I)</p> <p> 2. Tanks (J)</p> <p> 3. Surface Impoundments (K)</p> <p> 4. Waste Piles (L)</p> <p><u> </u> B. Land Treatment (M)</p> <p><u> </u> C. Landfills (N)</p> | <p><u> </u> D. Incineration and/or Thermal Treatment (O and P)</p> <p><u> </u> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete section IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	N/A
2. Facility expansion?	—	✓	—	N/A
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	SEE REMARK #1
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	BUT PLAN DOES NOT CONTAIN ANALYSIS OF ITEM B.1. THE ANALYSIS IS AVAILABLE AT FACILITY IN DIRECTOR'S OFFICE. 2. SATISFACTORY TO ME.
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	ANALYSIS NOT NEEDED SINCE WASTES REMAIN CONSISTENT.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	WARNING SIGN AT ENTRANCE THAT SLUDGES NOT NEEDED DUE TO NATURE OF MATERIAL.
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	BUT HAVE NOT YET OCCURRED
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
 (E) Do personnel training records include: (Effective 5/19/81)				
<i>COMPANY HAS HISTORICALLY EMPLOYED THEIR JOB SAFETY ANALYSIS PROGRAM</i>				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SEE REMARK #1
2. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

☐ ☒ ☐

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ ☐ ☐

2. Telephone or 2-way radios
at the scene of operations?

☒ ☐ ☐

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ☐ ☐

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ ☐ ☐

LIMITED NEED.

2. Is emergency equipment
maintained in operable
conditions?

☒ ☐ ☐

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ ☐ ☐

- (E) Is there adequate air space
for unobstructed movement?

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

- (A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

N/A DUE TO NATURE
OF WASTES.

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

LOGS KEPT BY OPERATORS IN THEIR RESPECTIVE AREAS

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— — —

N/A

c. The location and quantity of each hazardous waste within the facility?

✓ — —

LOCATION - YES
QUANTITY RECORDED AS
LOADED AWAY.

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — —

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ — —

f. Reports detailing all incidents that required implementation of the Contingency Plan?

~~YES~~ — —

N/A
~~YES TO N/A~~
~~NO NONE OCCURRED~~

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NOT REQ'D YET
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)		N/A		

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	COMPANY DOES NOT FEEL NEEDED & COMPLIES WITH DOT - OK WITH ME.
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓			
3. Do continuous feed systems have a waste-feed cutoff?	✓			MANUAL
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				N/A
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 17000 Zinc gallons 94000 gal spent Hydrochloric Acid

Tank diameter: plating feet

Distance of tank from property line SEVERAL HUNDRED feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? _____
2. Do earthen dikes have protective covers? _____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? _____
4. Is the freeboard level inspected at least daily? _____
5. Are the dikes inspected weekly for evidence of leaks or deterioration? _____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) _____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) _____

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	_____

*Not Inspected

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation? _____
2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)? _____
3. Is waste analyzed according to 265.273? _____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? _____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? _____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? _____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? _____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) _____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) _____

N
LANDFILLS

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	_____	_____	_____	_____
**2. Collection of run-off from active portions of the fill?	_____	_____	_____	_____
**3. Is collected run off treated?	_____	_____	_____	_____
4. Control of wind dispersal of hazardous waste?	_____	_____	_____	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
2. The contents of each cell and the location of each hazardous waste type within each cell?	_____	_____	_____	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
3. Has closure begun?	_____	_____	_____	_____
4. Is closure cost estimate available by 5-19-81?	_____	_____	_____	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
_____	_____	_____	_____	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?				
If not, the provisions of 40 CFR 265.17(b) apply.				
Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?				
2. Does the landfill have a chemically and physically resistant liner system?				
3. Does the landfill have a functional leachate collection system?				
4. Are free liquids stabilized prior to or immediately after placement in the landfill?				
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 12 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.



Re: Application Number 81-HW-0184
Trumbull County

RECEIVED

SEP 14 1981

September 10, 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Thomas Kachur
Manager Environmental Control
Republic Steel Mahoning Valley Warren
1040 Pine Avenue
Warren, Ohio 44481

Dear Mr. Kachur:

On July 29, 1981, William Skowronski of the Ohio Environmental Protection Agency conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by yourself.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, U.S. EPA, Region V
William Skowronski, NEDO

CERTIFIED MAIL

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____
2. _____
3. _____
4. _____
5. _____

- _____
- _____
- _____
- _____
- _____

III. Monitoring and Inspections

Yes No NI* Remarks

Are combustion/emission control instruments monitored at least every 15 minutes?

Is steady state maintained or corrections attempted?

Is stack plume observed at least hourly for normal color and opacity?

Did any stack observations made by owner or operator show a plume different than normal?**

If yes to D above, were corrections made to return emissions to normal appearance?**

Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

Are emergency shutdown controls and system alarms checked daily for proper operation?

- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____

at Inspected

Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

- | | Yes | No | NI* | Remarks |
|---|-------|-------|-------|---------|
| 1. Does this facility burn <u>only</u> waste explosives?
(A No answer means <u>other</u> hazardous waste is open-burned.) | _____ | _____ | _____ | _____ |
| 2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) | _____ | _____ | _____ | _____ |

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

SEE REMARK #1

- | | Yes | No | NI* | Remarks |
|---|-------|-------|-------|------------------|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? | ✓ | _____ | _____ | _____ |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?) | _____ | _____ | _____ | <i>N/A BATCH</i> |

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	TRANSPORTER REQ'D TO SUPPLY.

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

☒ ☐ ☐

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

WASTE ACID TO TORONTO

a. Notified the Administrator in writing?

☒ ☐ ☐

b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

☒ ☐ ☐

c. Met the Manifest requirements?

☒ ☐ ☐

2. Importing Hazardous Waste, has the generator:

Met the manifest requirements?

☐ ☐ ☐

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?				

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?

B. Are signed completed manifest(s) on file?

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?

B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

1. D002 - SHOULD BE REMOVED FROM APPLICATION SINCE DELISTED AND NOT EP TOXIC.

K062 - SPENT PICKLE LIQUOR

K087 - COAL TAR SLUDGE

D001 - GALVANIZE BAG HOUSE DUST WAS APPLIED FOR
^{IN DRY FORM}
AS IGNITABLE, BUT I THINK REACTIVE APPLIES
SINCE MATERIAL GIVES OFF HEAT SLOWLY WHEN
MOISTURE MAKES CONTACT. THIS MATERIAL IS
NOW MIXED ~~WITH~~ IN SPENT PICKLE LIQUOR SUMPS
DAILY TO AVOID HEAT BUILD UP.

✓ As per phone conversation with Dale Papaych, Solid Waste
Management Engineer with Republic Steel, the company
wishes to leave D002 in permit application at this point.

gpc 9-10-81